

Select Committee Agenda



Neighbourhoods Select Committee Tuesday, 21st March, 2017

You are invited to attend the next meeting of **Neighbourhoods Select Committee**, which will be held at:

**Committee Room 2, Civic Offices, High Street, Epping
on Tuesday, 21st March, 2017
at 7.30 pm .**

**Glen Chipp
Chief Executive**

**Democratic Services
Officer**

A Hendry, Directorate of Governance
email: democraticservices@eppingforestdc.gov.uk Tel:
01992 564246

Members:

Councillors N Bedford (Chairman), H Brady (Vice-Chairman), N Avey, R Baldwin, L Hughes, J Jennings, R Morgan, S Neville, A Patel, C P Pond, B Rolfe, M Sartin, G Shiell, E Webster and J H Whitehouse

SUBSTITUTE NOMINATION DEADLINE:

6.30 pm

1. APOLOGIES FOR ABSENCE

2. SUBSTITUTE MEMBERS (COUNCIL MINUTE 39 - 23.7.02)

(Director of Governance) To report the appointment of any substitute members for the meeting.

3. NOTES OF PREVIOUS MEETING (Pages 5 - 14)

To agree the notes of the meeting of the Select Committee held on 15 November 2016.

4. DECLARATIONS OF INTEREST

(Director of Governance). To declare interests in any items on the agenda.

In considering whether to declare a pecuniary or a non-pecuniary interest under the Code of Conduct, Overview & Scrutiny members are asked pay particular attention to paragraph 9 of the Code in addition to the more familiar requirements.

This requires the declaration of a non-pecuniary interest in any matter before an OS Committee which relates to a decision of or action by another Committee or Sub Committee of the Council, a Joint Committee or Joint Sub Committee in which the Council is involved and of which the Councillor is also a member.

Paragraph 9 does not refer to Cabinet decisions or attendance at an OS meeting purely for the purpose of answering questions or providing information on such a matter.

5. TERMS OF REFERENCE AND WORK PROGRAMME (Pages 15 - 18)

(Chairman / Lead Officer) The Overview and Scrutiny Committee has agreed the Terms of Reference of this Committee. This is attached along with an ongoing work programme. Members are asked at each meeting to review both documents.

6. RESPONSE TO THE GOVERNMENT'S HOUSING WHITE PAPER (Pages 19 - 46)

(Director of Neighbourhoods) to consider the attached report.

7. LOCAL PLAN UPDATE (Pages 47 - 60)

(Director of Neighbourhoods) to consider the attached report.

8. CORPORATE PLAN KEY ACTION PLAN 2016/17 - QUARTER 3 PROGRESS (Pages 61 - 70)

(Director of Governance) to consider the attached report.

9. KEY PERFORMANCE INDICATORS QTR 3 - 2016/17 AND REVIEW OF TARGETS FOR 2017/18 (Pages 71 - 94)

(Director of Governance) to consider the attached report.

10. REPORTS TO BE MADE TO THE NEXT MEETING OF THE OVERVIEW AND SCRUTINY COMMITTEE

To consider which reports are ready to be submitted to the Overview and Scrutiny Committee at its next meeting.

11. FUTURE MEETINGS

To note that this is the last meeting for this Municipal Year. Meetings scheduled for the new year are as follows:

27 June 2017;
19 September;
21 November;
30 January 2018; and
20 March

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**EPPING FOREST DISTRICT COUNCIL
NOTES OF A MEETING OF NEIGHBOURHOODS SELECT COMMITTEE
HELD ON TUESDAY, 15 NOVEMBER 2016
IN COMMITTEE ROOM 1, CIVIC OFFICES, HIGH STREET, EPPING
AT 7.30 - 9.10 PM**

Members Present: N Bedford (Chairman), H Brady (Vice-Chairman), R Baldwin, L Hughes, J Jennings, S Kane, A Mitchell, R Morgan, S Neville, A Patel, C P Pond, B Rolfe, G Shiell, E Webster and J H Whitehouse

Other members present: J Philip, A Lion, G Waller, C Whitbread and J Knapman

Apologies for Absence: N Avey and M Sartin

Officers Present D Macnab (Deputy Chief Executive and Director of Neighbourhoods), K Durrani (Assistant Director (Technical Services)), K Polyzoides (Assistant Director (Policy & Conservation)) and A Hendry (Senior Democratic Services Officer)

22. SUBSTITUTE MEMBERS (COUNCIL MINUTE 39 - 23.7.02)

It was noted that Councillors S Kane and A Mitchell were substituting for Councillors M Sartin and N Avey respectively.

23. NOTES OF PREVIOUS MEETING

RESOLVED:

That the notes of the last meeting of the Select Committee held on 13 September 2016 be agreed.

24. DECLARATIONS OF INTEREST

There were no declarations of interest made pursuant to the Member's Code of Conduct.

25. TERMS OF REFERENCE AND WORK PROGRAMME

The Committee noted their Terms of Reference and Work Programme.

The Assistant Director Technical Services, Mr Durrani informed the meeting that the Council would be taking over Off-Street Parking from 1st February. As this fell into the terms of reference for this select Committee, would the Committee like to receive regular updates on the progress of this service. The Committee agreed that initially yearly updates would be agreeable.

AGREED: to add review of Off-Street Parking the Select Committee's work programme with an initial requirement of a yearly review.

26. CHANGE IN ORDER OF THE AGENDA

With the Committee's approval the order of the agenda was changed so the they next considered agenda item 9, Local Plan Update and then agenda item 10, Chigwell Neighbourhood Plan.

27. LOCAL PLAN UPDATE

The Assistant Director Planning and Economic Development, Ms Polyzoides along with the Planning Consultant, Ms Blom-Cooper introduced the report updating the Committee on the Local Plan. The draft policies had been developed in close and regular consultation with key stakeholders including Members (District and Parish) and officers at a series of workshops. The draft Local Plan set out the Council's preferred approach to development in the District for the period up to 2033 including the amount of new homes and jobs that the plan sought to achieve. The purpose of the Plan was to deliver the vision and objectives for the District whilst contributing to sustainable development as described in the National Planning Policy Framework to achieve economic, environmental and social progress. This meant taking a balanced approach to meeting the needs of existing and future residents, businesses and visitors, whilst protecting and enhancing the natural and historic environment and built heritage and addressing the impacts of a changing climate.

The Draft Local Plan set out:

- The Council's vision and objectives for the District's development over the plan period;
- Policies to ensure that development delivers high quality, sustainable homes, drive the quality of design and maintain our high quality built and natural environment;
- The future distribution for housing growth and requirements for affordable housing;
- Policies to build a strong, competitive economy and the future distribution for new employment land space and thus new jobs;
- Policies to maintain and enhance the vibrancy and vitality of our towns centres;
- Policies to support a sustainable transport and road infrastructure network; and
- Proposals for delivery including a draft Infrastructure Delivery Plan (IDP) to demonstrate the infrastructure requirements necessary to support the site allocations and other proposals.

The full Council on the 18th October agreed that the Draft Local Plan be subject to a six week statutory consultation from 31st October to 12th December 2016. The draft Local Plan could be accessed on our website. This was a one stop shop so stakeholders could find the relevant information quickly, whilst accessing the technical detail if they were interested in further reading. Feedback has been that the website was easy to use and the questionnaire was straightforward and stakeholders were being urged to use this platform to submit their responses.

Each Member had received a Members Briefing Pack, which provided a guide to the Draft Local Plan and the consultation. An increased effort had been made to promote the consultation via social media. Where appropriate officers were using social media to address any major misconceptions or issues associated with the draft Local Plan.

The local public exhibitions have been well attended with approximately 259 people attending the North Weald one, 207 at Loughton, 238 at Chipping Ongar, 125 Waltham Abbey and 277 at Epping. The local plan was difficult to navigate but the exhibitions helped. Following these, officers were now getting questionnaires back on line and also some by post. They were expecting a surge in submissions towards the end of the consultation period.

Officers would look at all the responses and process them into a finished document for publication and publish it under Regulation 19. This would be the document that the Council considered was ready for examination. In the meantime decision makers could give weight to the relevant policies in emerging plans according to the stage of preparation of the emerging plan – the more advanced the preparation, the greater the weight that could be given – in accordance with paragraph 216 of the National Planning Policy Framework. The Council has agreed that some weight can now be given to the Draft Local Plan when determining planning applications.

The Director of Neighbourhoods, Mr Macnab commented that he had attended all the local exhibitions and had detected common themes. A lot of people had no awareness that a lot of the sites had been promoted by private landowners or thought that the District Council had acquired these sites to its advantage. Also a lot of issues raised were around the lack of infrastructure, such as GP surgeries, schools and transport. However, it had been a generally successful process.

Councillor Rolfe noted that the numbers of people attending the exhibitions were not that many compared to the interest shown before. They also seem to have missed the bit that asked them to present a coherent argument when arguing against any part of the Plan. All they generally say was that they did not want it.

Councillor Whitehouse asked what would happen at the end of the consultation, how could you access them and who would make the decisions? Councillor Philip said that for any new sites they would use the same criteria to judge them as they used now. How we worked through them was still to be decided. All members would be kept informed on a regular basis and as a Council we would publish this updated plan under Regulation 19.

Councillor Kane noted that there was work to be done on employment sites; was there more work to be done on infrastructure? Ms Blom-Cooper replied that there was still work to be done on employment and the sites identified, with an update to be carried out in terms of supply. All sites in the draft Local Plan would go through the assessment process and then through various workshops. As for infrastructure, the draft plan was looking to identify the current gaps. More detailed work was to be undertaken as the inspector would need to see it.

Councillor Neville commented that in the Members Briefing Pack an easy guide on what reasons we needed to use was promised, but it was not there. Councillor Philip said that they had not promised to give all reasons, but we did give examples. Ms Blom-Cooper added that he should look at the criteria used to take the various sites into account. Ms Polyzoides added that he could see online various reasons why we did not chose a particular site. This was very useful.

Councillor Lion asked about traffic surveys in the district and if there were any benchmarking exercise that would be used. Ms Blom-Cooper said that there was a baseline survey carried out in 2013 that would be used. They would also need to look at local sites and these would be commissioned soon. Councillor Philip added that there was also a high level survey carried out around Harlow.

Councillor Patel commented on the type and specifications of the housing that came forward and noted from his health and wellbeing board and a survey on housing adaptations and how they would work in the policy. Ms Blom-Cooper said they would be working with the land owners and would have a specification in the draft Local Plan on this. Councillor Philip said that the SHMA (Strategic Housing Market Area) went into what sort of delivery was needed. This would be set out in the SHMA and on the population projections. Councillor Patel responded that with spending cuts, was category 2 a sufficient level we should be working at or should we be working at a wider level. Ms Blom-Cooper said they would be considering a wider level and would look at the viability of the plans as they took it through. Mr Macnab added that as part of the House Building Programme they would be looking to build up to these standards.

RESOLVED:

That the update on the Draft Local Plan (public consultation) was noted.

28. CHIGWELL NEIGHBOURHOOD PLAN

The Consultant, Ms Blom-Cooper introduced the Council's response to the Draft Chigwell Neighbourhood Plan. It needed to be broadly in conformity with the Council's own Local Plan and had to meet certain basic conditions.

Chigwell Parish Council had published its Draft Neighbourhood Plan for a period of formal public consultation which commenced on Monday 10 October 2016 and would run for six weeks, finishing on Monday 21 November 2016. The closing date for submission of comments was 25 November 2016. The District Council commended the Parish for the work undertaken in production of the Draft Neighbourhood Plan and sought to make a formal representation to the plan through the report on this agenda.

It was noted that the requirements that apply to plan making at the neighbourhood level were not as onerous as those required by a District Local Plan. The examination process was 'light touch' and considered a limited number of matters. In order to pass examination a Neighbourhood Plan must comply with the basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to Neighbourhood Plans by section 38A of the Planning and Compulsory Purchase Act 2004. The plan met the basic conditions if:

- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State it was appropriate to make the plan;
- b) The making of the plan contributes to sustainable development;
- c) The making of the plan was in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area); and
- d) The making of the plan did not breach, and is otherwise compatible with, EU obligations and human rights requirements.

Officers had some concerns on sustainability on some sites, there were also concerns about the viability of a proposed local parish bus service. They have not produced a viable business case that would show this to be a sustainable service. There were also concerns about proposed alterations to the Green Belt. Some of the proposals fall into locations some distance from current settlements, which may result later on in the infilling of the two areas. Officers suggested that a critical friend review was undertaken for this plan.

Councillor Knapman said that he was worried that this Committee was asked to endorse the officers response to the draft plan. He could not believe that the committee had seen all the background documents. He was happy to have EFDC officers express their concerns, but this reports states that this was a response from 'the Council'. This Committee was not the 'Council'. As for the proposed bus service, EFDC have a S106 agreement where we had been granted £1million for this bus service. But as with all these services it could not be guaranteed "in perpetuity". He asked that this Committee just notes the officers concerns but not endorse the report. We should be having meetings with EFDC officers on the details for our Local Plan.

Councillor Philip commented that if the Select Committee wished to just note this then he was happy to do a Portfolio Holder's report to give a response from the Council but not from the officers. The officers have gone through Chigwell's draft plan and have provided reasoned arguments. Happy to have you disagree as this was all a learning process. The critical friend process would be a good thing to do.

Councillor Knapman responded that he did not see how a Committee who had not read our documents could make a proper decision on this. Why endorse something that could be wrong as a number of things were incorrect.

Mr Macnab noted that the Overview and Scrutiny rules allow the Committee to make these decisions on various consultations, it was in their gift and they had done it many times before. The point that officers were making on the proposed bus service was that they needed to see a business case.

Councillor Brady agreed that members had not seen all the plans etc. but the officers feel that some parts differed enormously from the whole and we need to listen to the officers comments.

Councillor Philip noted that Select Committees had responded to consultations without seeing the whole document. We have responded to other local plans relying on officers for advice. This was probably the best way we could do this.

Councillor Whitehouse proposed that that we note rather than endorsing this report, for the reasons given by Councillor Knapman. This was seconded by Councillor Pond. This proposal was then put to the vote and fell.

The Chairman then put the substantive recommendation from the report to the vote, which was carried.

RESOLVED:

That the points as outlined in the report as the main substance of a response to Chigwell Parish Council following publication for consultation of the Draft Chigwell Neighbourhood Plan be agreed.

29. KEY PERFORMANCE INDICATORS 2016/17 QUARTERLY REVIEW

The Director of Neighbourhoods, Mr Macnab introduced a report on the second quarter performance of the Key Performance Indicators for 2016/17. The Committee noted that 13 of the Key Performance Indicators fell within the Neighbourhoods Select Committee's areas of responsibility. The overall position with regard to the achievement of target performance at Q2 for these 13 indicators was as follows:

- (a) 11 (85%) indicators achieved target;
- (b) 2 (15%) indicators did not achieve target; and
- (c) 0 (0%) of these KPI's performed within the agreed tolerance for the indicator;
- (d) 11 (85%) of indicators are currently anticipated to achieve year-end target, and no further indicators are uncertain whether they will achieve year-end target.

The 'amber' performance status used in the KPI report identifies indicators that have missed the agreed target for the quarter, but where performance was within an agreed tolerance or range. The KPI tolerances were agreed by Management Board when targets for the KPIs were set in February 2016.

The Select Committee then went through each of the 13 indicators.

NEI001 - *how much non-recycled waste was collected for every household in the district* – the figure was below the target in quarter 1 but had exceeded the target in quarter 2. Members thought it likely that the target would be met at the year end should be changed from red to orange.

Councillor Pond asked for clarification of the strategies used for corrective action. The Assistant Director, Technical Services, Mr Durrani replied they needed to divert the recyclable waste from the black bin to the recycle waste bin. They would use some of their enforcement polices but were mainly looking to educate and inform. They were also working with blocks of flats as they were having issues with them and also with schools.

Councillor Whitehouse asked about residual bins with partially open lids. Did officers call on the residents to tell them? Mr Durrani replied that Biffa staff could not do that as they were on a tight timetable. Sometimes it appeared that the residents would put out the smaller recyclable items on the top of the bin to be taken away. They do however collect the partly opened 'smiley' bins.

Councillor Knapman asked if the Civic offices recycled its paper other than the confidential paper it collected. Mr Durrani said he would check it out and get back to him.

Councillor Neville asked if they used the Town and Parish newsletters to educate the public on recycling and waste. Mr Durrani replied that they have contacted various Town and Parish Councils and would get back on the outcomes.

Councillor Bedford asked what happened if the waste was contaminated. Mr Durrani replied that Biffa would put a sticker on the bin and leave it. If it got through to the recycle centre we would then get penalised for it. Councillor Bedford asked which was better to put stuff in the recycling bins or landfill. Mr Durrani said it put in recycling bin. It could cost the County about £80m a year. They have found 40 to 50% in sampling of black bins was recyclable waste.

NEI003 – *what % of our district had unacceptable levels of litter* – Councillor Brady commented that some roads had really bad levels of litter such as the M11 roundabout at Harlow. Who dealt with this? Mr Durrani said that the district was divided into 300 sections and they are randomly inspected. The A414 is done by Essex, but it may be the roundabout was looked after by us. We could look into enforcement aspects and talk to the Highways Agency about this.

NEI008 – *what % of the recorded incidences of fly-tipping (variation order / non-contract) are removed within 10 working days of being recorded* – Councillor Brady asked about any unsafe objects (such as gas canisters) that have been fly-tipped and we could not remove them? She was told that there was a special helpline that we could ring.

NEI010 – *what was the net increase or decrease in the number of homes in the district* – Mr Macnab noted that we only had a certain amount of control over the supply of new homes. We did our jobs to the appropriate timescale, but the developers sometimes leave it up to three years to start their work. Councillor Brady noted that there was no actual target until the Local Plan came in. Mr Macnab added that they may wish to make this more locally relevant and set the long term target assessment to red as opposed to the green it was now.

Councillor Patel noted that other Local Authorities when considering Housing needs re-evaluate every five years. Did we really need quarterly targets and were they relevant. Mr Macnab replied that it was a national indicator for government use. When our Local Plan came in we could have a more relevant local indicator.

NEI013 – *what % of all household waste was sent to be recycled or reused* – Mr Macnab noted that this was a new indicator. It was currently slightly under target but should be OK at year's end.

RESOLVED:

That the Select Committee noted and reviewed the Quarter 2 performance of the Key Performance Indicators for 2016/17.

30. CORPORATE PLAN KEY ACTION PLAN 2016/17 - QUARTERLY PROGRESS

The Director of Neighbourhoods, Mr Macnab introduced the quarterly report on the progress of the Corporate Plan Key Action Plan 2016/17 (quarter 2 progress). The meeting noted that the Corporate Plan was the Council's key strategic planning document, setting out its priorities over the five-year period from 2015/16 to 2019/20. The priorities or Corporate Aims were supported by Key Objectives, which provided a clear statement of the Council's overall intentions for these five years.

The meeting noted that there were 49 actions in total for which progress updates for Q2 are as follows:

- 29 (59%) of these actions have been 'Achieved' or are 'On Target';
- 14 (29%) of these actions were 'Under Control';
- 2 (4%) were 'Behind Schedule';
- 4 (8%) were 'Pending'.

12 actions fall within the areas of responsibility of the Neighbourhoods Select Committee. At the end of Q2:

- 9 (75%) of these actions have been 'Achieved' or were 'On-Target';
- 2 (17%) of these actions were 'Under Control';
- 1 (8%) of these actions were 'Behind Schedule';
- 0 (0%) of these actions were 'Pending'.

Councillor Whitehouse queried that the target date for completion for action 4 (*to facilitate, by purchase of ECC's interest and subsequent disposal to the preferred developer, the St John's Road redevelopment scheme*) was October 2016 and had now passed. Mr Macnab said that they had yet to complete the purchase of the District Council Land, but that this was now near completion.

Councillor Patel queried what the revised date for action was 6 (*evaluate the submission received for North Weald Airfield marketing exercise*). Mr Macnab explained that the expectation was to go out and seek concessionary contract but the EU rules have changed and it should be back on track by next May.

RESOLVED:

That the Committee noted and reviewed the quarter 2 progress of the Corporate Plan Key Action Plan for 2016/17 in relation to its area of responsibility.

31. ENVIRONMENTAL CHARTER AND OBJECTIVES

The meeting reviewed the report updating them on the progress of the Environmental Charter. It was noted that the development of an Environmental Charter and associated action plan was added to the Green Working Party's (GWP) work programme. Over a period of months the GWP developed the Charter and associated 'commitments and actions' and these were agreed by this Select Committee at its meeting on 28 June. The Select Committee recommended the Charter to the Cabinet and asked to receive an annual report on the progress of the Charter against its action plan.

The Cabinet considered the documents at its meeting on 1 September and endorsed the Charter and associated 'Commitments and Actions'. In accordance with the Cabinet's agreement, the Charter had been signed by the Leader of the Council and the Chief Executive on behalf of the Council.

At its meeting on 7 September 2016 the Corporate Green Working Party agreed that items in its existing Work Plan should be incorporated into the new 'Commitments and Actions' format. This will be further developed at the Working Party's next meeting on 9 December 2016.

Councillor Brady commented that these were all plans that needed to be actioned. She noted that there had been plans to move the Civic Offices away from the transport hubs which would cause more car use and would therefore flout this charter. Mr Macnab noted that action plans lay behind this and they would report back on them. Officers could adopt homeworking and the use of environmentally friendly vehicles etc.

Councillor Neville wondered how often the Corporate Green Working Party would update the action plan. Councillor Waller commented that it was important that we follow up on our words with actions. He noted that this building was now more energy efficient and that they hoped to put in car charging points around the district.

The Chairman said that the Committee should review this on a yearly basis and that it should be put into the work programme. This was agreed by the committee.

RESOLVED:

- (1) That the progress on the Environmental Charter be noted; and
- (2) That the Charter be reviewed on an annual basis.

32. REPORTS TO BE MADE TO THE NEXT MEETING OF THE OVERVIEW AND SCRUTINY COMMITTEE

The Committee thought that a short report back to the Overview and Scrutiny Committee should be given on the items covered at this meeting.

33. FUTURE MEETINGS

The Committee noted the dates for their future meetings.

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NEIGHBOURHOODS SELECT COMMITTEE

TERMS OF REFERENCE – 2016/17

Title: Neighbourhoods Select Committee

Status: Select Committee

Terms of Reference:

General

1. To undertake overview and scrutiny, utilising appropriate methods and techniques, of services and functions of the Neighbourhood and excluding those matters within the remit of the Audit and Governance Committee, the Standards Committee or the Constitution Working Group;
2. To consider any matter referred to the Select Committee by the Overview and Scrutiny Committee;
3. To keep under review:
 - (i) *Environmental enforcement activities;*
 - (ii) *Waste management activities; and*
 - (iii) *Leisure Management*
 - (iv) *Local Plan Scrutiny*
4. To respond to applicable consultations as appropriate;
5. To establish working groups as necessary to undertake any activity within these terms of reference;
6. To identify any matters within the services and functions of the Neighbourhoods Directorate that require in-depth scrutiny and report back to the Overview and Scrutiny Committee as necessary;

Performance Monitoring

7. To undertake performance monitoring in relation to the services and functions of the Neighbourhoods Directorate, against adopted Key Performance Indicators and identified areas of concern;

Environment

8. To monitor and keep under review the Council's progress towards the development and adoption of a corporate energy strategy / environmental policy and to receive progress reports from the Green Working Party.
9. To receive reports from the Waste Management Partnership Board in respect of the operation of and performance of the waste management contract;

Leisure

10. To monitor and keep under review leisure management matters and in particular the procurement of the Leisure Management Contract.

Chairman: Cllr. N Bedford

Neighbourhoods Select Committee (Chairman – Cllr N Bedford) Work Programme 2016/17

Item	Report Deadline / Priority	Progress / Comments	Programme of Future Meetings
(1) Enforcement activity	March 2017	Annual report to Committee	28th June 2016; 13 September; 15 November; 24 January 2017 (Cancelled); 21 March
(2) KPIs 2015/16 – Outturn Review	First meeting of each municipal year	Outturn KPI performance report for 2015/16 - went to June 2016 meeting	
(3) KPIs 2016/17 - Quarterly review	Quarterly	Review of quarterly performance: Q1 in September 2016; Q2 in November '16; Q3 in March '17	
(4) Corporate Plan Key Action Plan 2015/16 – Outturn Review	First meeting of each municipal year	Outturn Key Action Plan 2015/16 performance - went to June 2016 meeting	
(5) Corporate Plan Key Action Plan 2016/17 – Quarterly Review	Quarterly	Review of quarterly performance: Q1 September 2016; Q2 November 2016; Q3 March 2017	
(6) To receive updates from the Green Corporate Working Party	As appropriate (Last update received on the current position in November '15)	To monitor and keep under review the Council's progress towards the development and adoption of a corporate energy strategy/environmental policy and to receive progress reports from the Green Working Party.	
(7) To receive regular updates on the current position of the Local Plan	Update to go to each meeting.	Committee to keep a watch in brief on the position of the District's Local Plan – (last went to November'16 meeting)	

**Neighbourhoods Select Committee (Chairman – Cllr N Bedford)
Work Programme 2016/17**

Item	Report Deadline / Priority	Progress / Comments	Programme of Future Meetings
(8) Presentation on the problems and possible solutions for fly-tipping in the EFDC area	13 Sept. 2016	The meeting received an update from EFDC officers on fly-tipping.	
(9) To receive an annual update on the Environmental Charter	June 2017	At their meeting on 28 June 2016 the Committee agreed to receive an annual update of the Council's Environmental Charter	
(10) Review of Land Drainage arrangements	13 September 2016	Item from the O&S Co-ordinating Group. The Committee received a presentation from Officers on land drainage arrangements and problems.	
(11) Review of arrangements for ensuring the behaviour of Licenced taxi Drivers	TBA	Item from the O&S Co-ordinating Group.	
(12) Yearly Review of the Off-Street Parking Service	TBA	At their November 2016 meeting the Committee agreed to review on an annual basis the off-street parking service recently taken over by EFDC from NEPP.	



Report to Neighbourhood Select Committee

Date of meeting: 21 March 2017

Subject: Response to the Government's Housing White Paper

Officer contact for further information: Alison Blom-Cooper
Ext 4066

Committee Secretary: A Hendry

Recommendations/Decisions Required:

To agree the submission of a response to Government as set out in Appendix 2 to this report.

Report:

1. On 7 February 2017 the Government published 'Fixing our broken housing market'. This is in the form of a White Paper. The White Paper provides an analysis of the issues and challenges facing both the delivery of and access to housing. The document comprises a range of 'proposals' which are the subject of consultation and issues on which it is seeking comment. It also provides a range of questions for comment. The questions posed have formed the basis of the suggested response to the consultation, which is attached as Appendix 2 to this report.
2. The White Paper covers four key areas as follows:
 - Planning for the right homes in the right places,
 - Building homes faster,
 - Diversifying the market; and
 - Helping people now.

Appendix 1 to this report sets out a summary of the measures for the first two of these areas.

3. At this stage many of the proposals carry no firm commitment to implement, as drafted. They will be considered further having reviewed the responses made to this consultation. Some proposals would require changes to regulation, whilst some would require amendments to national policy, including to the National Planning Policy Framework (NPPF). However, there are some areas of policy where the Government has clearly indicated that it 'will' take actions and changes to the NPPF forward, including:
 - Criteria based intervention on local plans;
 - Removal of the policy expectation that each local planning authority should produce a single local plan;
 - Amending a test of a sound plan, making clear that it should be AN appropriate strategy not THE most appropriate strategy;
 - Revision of the NPPF to indicate great weight should be attached to the value of using suitable brownfield land within settlements for homes: the presumption should be that

brownfield land within settlements is suitable for housing unless there are clear and specific reasons otherwise e.g. flood risk;

- A presumption that residential development opportunities on small sites should be treated positively; and
 - A broadened definition of affordable housing. The broadened definition is itself the subject of consultation.
4. Some of the matters raised in the White Paper have already been taken into account in developing the Council's Draft Local Plan, in part because they relate to good practice in planning for places or because, as can be seen from the detailed response at Appendix 2, these are matters that EFDC already consider to be clear within the NPPF. There are, however, a number of proposals which are likely to have implications for the development of the Council's Local Plan, depending on the outcome of the consultations and any subsequent changes to the NPPF. Significant areas relate to the proposal to introduce a standard methodology for the identification of Objectively Assessed Housing Needs, the introduction of a Housing Delivery Test, and proposed amendments to the definition of affordable housing. The proposed definition includes Starter Homes, discounted market sales housing and affordable private rent housing. In addition the White Paper sets out the Government's proposal to make it clear in national planning policy that local authorities should seek to ensure that a minimum of 10% of all homes on individual sites are affordable home ownership products [to apply to sites of 10 units or more (or 0.5 ha plus)]. This is a change from previous Government announcements which indicated that a minimum of 20% Starter Homes should be provided on all sites of 10 + units or sites of 0.5ha +.
5. It was also announced in the White Paper that planning application fees will be increased by 20% from July 2017 if local authorities commit to investing the additional fee income in their planning department. Government also advised that it was minded to allow an increase of a further 20% for those authorities who are delivering the homes their communities need and that it would be consulting further on the detail, as well as keeping the resourcing of local authority planning departments, and where fees can be charged, under review. This was reported to Cabinet on 9 March 2017. Paragraphs 1–4 of that report set out that:

'1. The housing white paper repeats the claim from developers that the lack of capacity and capability in planning departments is restricting their ability to get on site and build. To boost local authority capacity and capability to deliver, DCLG has offered to increase nationally set planning fees by 20% from July 2017. The stated intention here is to improve the speed and quality with which planning applications are handled while deterring unnecessary appeals.

2. Local authorities can choose to accept or reject the proposed 20% increase in planning application fees. If an authority wishes to accept the increase they must commit to spending the additional income on planning functions.

3. The offer was made in a letter sent by DCLG on 21 February 2017, see Annex 1. This letter requires a response by 13 March 2017 and the response must be signed by the Section 151 Officer (the Director of Resources).

4. There are already considerable pressures on the Development Management Service and these are likely to increase as the Local Plan progresses. By

accepting the increase in fees and using the additional money to enhance the service the Council will be providing a better service at no additional cost to Council Tax payers.

Resource Implications:

The service is anticipated to have a net cost to the Council of approximately £400,000 in both 2016/17 and 2017/18. If fees were to be increased from July 2017 this would be likely to generate additional income in 2017/18 of £150,000. As this income would have to be spent on planning functions there would not be any reduction in the net cost of the service but an enhanced service could be provided.

The report recommends that the offer is accepted and that a commitment is given that the additional income is spent on planning functions. However, as the Cabinet report sets out:

'The Development Control service is not cost neutral so there is an argument that the users of the service should be paying more already. Currently the service is being part funded by all Council Tax payers even though the majority of them do not use the service.'

6. It is therefore recommended that as part of the response to DCLG on the White Paper that the following is submitted:

'The Council welcomes the increase in planning application fees and is committed to spending the additional income on planning functions. However, EFDC wish to advise that the increase in planning application fees would be insufficient to cover the current cost of the Development Control Service. Therefore, whilst the additional fee income would support an enhancement of the Service at no extra cost to Council Tax payers, those payers are part funding and will continue to, part fund the service even though the majority of them do not use the service. In the context of the move towards local authorities becoming financially 'self-sufficient' from 2020 onwards, charges for planning applications are, as far as the Council is aware, the only service where fees are still set nationally. EFDC would therefore strongly request that Government reviews its position on this matter. Furthermore, this does not take into account the costs of the plan-making process which is not just about the development of EFDC's Local Plan, but also other activities such as the Masterplanning of strategic sites which seek to ensure the speedy delivery of the high quality housing that the District needs.'

Reason for decision: To provide the opportunity for the Council to make its views known as part of the consultation on the Housing White Paper on matters which are relevant to its functions as local planning authority and housing authority as well as other functions.

Options considered and rejected: To not make a response to the consultation

Consultation undertaken:

Resource implications: N/A

Budget provision: N/A

Personnel: Planning Policy Team

Land: N/A

Community Plan/BVPP reference: N/A

Relevant statutory powers: N/A

Background papers:

'Fixing our Broken Housing Market' – A housing white paper setting out the Government's plans to reform the housing market and boost the supply of new homes in England. (DCLG, 7 February 2017)

<https://www.gov.uk/government/publications/fixing-our-broken-housing-market>

Environmental/Human Rights Act/Crime and Disorder Act Implications: None

Key Decision reference: (if required)

Appendix 1

A summary of the proposals in the first two key areas is set out below:

Planning for the right homes in the right places:

1. Making sure every community has an up-to-date, sufficiently ambitious plan and the intention to intervene in plan-making based on previously consulted on criteria using existing powers and those proposed in the Neighbourhood Planning Bill.
2. Set out in regulations a requirement for local plans and other local development documents to be reviewed at least every five years.
3. Will consult on changes to the NPPF so that authorities are expected to prepare a Statement of Common Ground.
4. Propose to allow spatial development strategies to allocate strategic sites.
5. Use the new £2.3bn Housing Infrastructure Fund to encourage and support collaboration.
6. Allow the Secretary of State to direct a group of authorities to work together.
7. Remove the policy expectation that each local authority should produce a single local plan.
8. Set out in policy the key strategic priorities that every area is expected to plan for.
9. Make it clear that plans and policies should not duplicate one another.
10. Amend the tests as to what is expected of a sound plan to make it clear that it should set out 'an' appropriate strategy of an area rather than having to demonstrate that it contain 'the most' appropriate strategy.
11. Revise the NPPF to tighten the definition of what evidence is required to support a 'sound' plan.
12. Welcomes views on what wider changes may be needed to ensure that consultation and examination procedures for all forms of plan-making are appropriate and proportionate and that different levels of plans work together.
13. Consult on options for introducing a more standardised approach to assessing housing requirements.
14. Propose that from April 2018 the new methodology for calculating housing requirements would apply as the baseline for assessing five year housing land supply and housing delivery, in the absence of an up-to-date plan.
15. Strengthen national policy so that local planning authorities are expected to have clear policies for addressing groups with particular needs such as older and disabled people.
16. Increase the amount of planning data that is readily available to individuals, groups, entrepreneurs and businesses.
17. Making landownerships and interests more transparent: including that all publically-held land in the areas of greatest housing need will be registered by 2020; improving the availability of data about wider interests in land; and HM Land Registry making available, free of charge, its commercial and corporate ownership data set and the overseas ownership data set.
18. Making amendments to the NPPF so that when preparing plans local planning authorities should be able to demonstrate that they have a clear strategy to maximise the use of suitable land in their area and that their identified housing requirement should be accommodated unless there are policies elsewhere in the NPPF that provide strong reasons for restricting development.
19. Clarify which national policies it regards as providing a strong reason to restrict development when preparing plans.

20. That the presumption in favour of sustainable development could be clarified further.
21. Amending the NPPF to indicate that great weight should be attached to the value of using suitable brownfield land within settlements for homes.
22. Amend regulations so that all local planning authorities are able to dispose of land with the benefit of planning consent which they have granted themselves.
23. Consult on using powers in the Growth and Infrastructure Act 2013 to issue a new General Disposal Consent, which would enable authorities to dispose of land held for planning purposes at less than best consideration without the need for specific consent from the Secretary of State.
24. Amend the NPPF to encourage local planning authorities to consider the social and economic benefits of estate regeneration.
25. Expect local planning authorities to have policies that support the development of small 'windfall' sites and indicate that great weight should be given to using small undeveloped sites within settlements for homes.
26. Amend the NPPF to highlight the opportunities that neighbourhood plans present for identifying and allocating small sites that are suitable for housing, encourage local planning authorities to identify opportunities for villages to thrive and give much stronger support for 'rural exception' sites that provide affordable homes for local people.
27. Make clear that on top of the allowance made for windfall sites that at least 10% of the sites allocated for residential development in local plans should be of half a hectare or less.
28. Expect local planning authorities to work with developers to encourage the sub-division of large sites and encourage greater use of Local Development Orders and area wide design-codes so that small sites may be brought forward quickly.
29. To support the delivery of existing and any future garden communities ensure that decisions on infrastructure investment take better account of the opportunities to support new and existing communities, legislate to enable the creation of locally accountable New Town Development Corporations and amend policy to encourage a more proactive approach by authorities to bringing forward new settlements.
30. Amend national policy to make clear that authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development needs, and that where land is removed from the Green Belt, local policies should require the impact to be offset by compensatory improvements to the environmental quality or accessibility of remaining Green Belt land.
31. Proposing that national policy would make clear that when carrying out a Green Belt review, local planning authorities should look first at using any Green Belt land which has previously been developed and/or which surrounds a transport hub.
32. Amend the NPPF to make clear that appropriate facilities for existing cemeteries are not regarded as 'inappropriate development' in the Green Belt; that development brought forward under a Neighbourhood Development Order should not be regarded as inappropriate, provided it preserves openness and does not conflict with the purposes of the Green Belt; and where a local or strategic plan has demonstrated the need for Green Belt boundaries to be amended, the detailed boundary may be determined through a neighbourhood plan.
33. Amend the NPPF so that local planning authorities are expected to provide neighbourhood planning groups with a housing requirement figure
34. Local and neighbourhood plans (at the most appropriate level) and more detailed development plan documents (such as area action plans) are expected to set out clear design expectations following consultation with local communities.

35. Strengthen the importance of early pre-application discussions.
36. Make it clear that design should not be a valid reason to object to development where it accords with clear design expectations set out in statutory plans and that policy recognises the value of using a widely accepted design standard such as Building for Life.
37. Amend the NPPF to make it clear that plans and individual development proposals should: make efficient use of land and avoid building homes at low densities; address the particular scope for higher density housing in urban locations; ensure that the density and form of development reflect the character, accessibility and infrastructure capacity of an area and the nature of local housing needs; and take a flexible approach in adopting and applying policy and guidance that could inhibit these objectives in particular circumstances, such as open space provision in areas with good access to facilities nearby.
38. Amend national planning guidance to highlight planning approaches that can be used to support higher densities.
39. Considers that indicative density standards could be helpful in driving the right level of ambition in areas of high demand and is seeking views on what standards would be appropriate, and the locations to which they would apply.
40. Wanting to do more to support hospitals, schools and other public sector landowners to deliver more homes within new and existing sites (e.g. infill development, building on top of existing buildings or making better use of land within existing boundaries, whilst maintaining protections for green spaces and school playing fields and seeking views on how the planning system can best support such development.
41. Reviewing the Nationally Described Space Standards and how it is used in planning to support greater local housing choice, while ensuring avoiding a race to the bottom in the size of homes on offer.

Building Homes Faster

1. Amend the NPPF to give local authorities the opportunity to have their housing land supply agreed on an annual basis and fixed for a one-year period and that authorities that wish to take advantage of this policy will need to provide for a 10% buffer on their five year land supply.
2. Seeking views on amendments to the written ministerial statement giving protection to neighbourhood plans in relation to a neighbourhood plan meeting its share of local housing needs, that it is subject to the local planning authority being able to demonstrate through the housing delivery test that, from 2020, delivery has been over 65% (25% in 2018, 45% in 2019) for the wider authority area and whether it should remain a requirement to have site allocations in the plan or should the protection apply as long as housing supply policies will meet their share of local housing need.
3. Deterring unnecessary appeals through charging.
4. Consulting on requiring local authorities to have planning policies setting out how high quality digital infrastructure will be delivered in their area, and accessible from a range of providers.
5. Revise the NPPF to make clear the status of endorsed recommendations of the National Infrastructure Commission.
6. Improve the quality and analysis of information on housing delivery through the new Housing Delivery Test, better information on build out rates by builders and better information on the development pipeline.
7. Amend the NPPF to encourage local authorities to consider how realistic it is that a site will be developed, when deciding whether to grant planning permission for housing, on sites where there is evidence of non-implementation of earlier permissions for housing

development, and seeking views on whether an applicant's previous track record of delivering previous, similar schemes should be taken into account when determining planning applications, with a focus on major developers.

8. Propose to amend legislation to remove the requirement for the Secretary of State to confirm a completion notice before it can take effect and intend to amend legislation, subject to consultation, to allow a local authority to serve a completion notice on a site before the commencement deadline has elapsed, but only where works have begun.
9. Introduce a new housing delivery test through changes to the NPPF, measure this using net housing completions and on a three year rolling period, and when under-delivery is identified proposes a tiered approach to addressing the situation which would be set out in national policy and guidance. Government will consider how it can support authorities experiencing significant under-delivery in addressing the challenges in their action plans (which are proposed as part of the requirements if there is under-delivery).
10. Change the definition of affordable housing and make it clear that local authorities should seek to ensure that a minimum of 10% of all homes on individual sites are affordable home ownership products. Views are also sought on whether Build to Rent Schemes, dedicated supported housing, Custom Build schemes and development on 'rural exception' sites should be excluded from this requirement and whether there are any other types of residential development that should be excluded.
11. Amend the NPPF to make clear that the reference to the three dimensions of sustainable development (environmental, social and economic), together with the core planning principles and policies at paragraphs 18-219 of the NPPF together constitute its view on what sustainable development means for the planning system in England.
12. Amend the list of climate change factors set out in the NPPF to include rising temperatures and make it clear that local planning authorities should support measures for the future resilience of communities and infrastructure to climate change.
13. Make some amendments to clarify the application of the Exceptions Test in relation to flood risk, clarify that planning applications for minor developments and changes of use are expected to meet the requirements of paragraph 103 of the NPPF with the exception of the Sequential and Exception Tests, and clarify that planning policies to manage flood risk should, where relevant, also address cumulative flood risks which could result from the combined impacts of a number of new but separate developments in (or affecting) areas identified as susceptible to flooding.
14. Amend the NPPF to emphasise that planning policies and decisions should take account of existing businesses and other organisations and, where necessary, to mitigate the impact of noise and other potential nuisances arising from existing development.
15. Amend the NPPF to integrate the Government's Written Ministerial Statement of 18 June 2015 in relation to considerations for onshore wind energy planning applications.

Appendix 2: Draft Response to Housing White Paper Questions

Question 1

Do you agree with the proposals to:

a) Make clear in the National Planning Policy Framework that the key strategic policies that each local planning authority should maintain are those set out currently at paragraph 156 of the Framework, with an additional requirement to plan for the allocations needed to deliver the area's housing requirement?

In principle, however there are two matters worthy of comment – first, the list in Paragraph 156 applies to a full local plan, the governments proposed strategic plans may more appropriately deal with a lesser range of matters, and in particular those prepared jointly. Second, the matter regarding allocations is already implicit within paragraph 157 bullet points 4 and 5.

b) Use regulations to allow Spatial Development Strategies to allocate strategic sites, where these strategies require unanimous agreement of the members of the combined authority?

EFDC has no views on this matter.

c) Revise the National Planning Policy Framework to tighten the definition of what evidence is required to support a 'sound' plan?

The ambition to ensure that evidence is proportionate is welcomed. In doing so, as always, there will need to be local discretion as there will be occasions where local circumstances may require some bespoke evidence work.

Question 2

What changes do you think would support more proportionate consultation and examination procedures for different types of plan and to ensure that different levels of plans work together?

We would support the principles in relation to the recommendations set out in the Local Plan Expert Group Report to Government March 2016 at page 32 as follows (recognising that the White Paper is proposing that a local planning authority would not be required to prepare a single plan):

9.9 The principle amendment that is required is to enable the authority to change the plan in response to public consultation. We recommend that the Local Plans Regulations are amended to allow local planning authorities to make modifications to the draft of the local plan following consultation and prior to submission.

9.10 Those modifications should also be the subject of consultation but this does not need to slow the submission of the plan because those representations would be made available to the local plan Inspector well before the commencement of examination hearings. If this recommendation is accepted, therefore, authorities would:

i. Publish a fully drafted local plan and invite representations;

ii. Consider if they wish to modify the plan in response to those representations;

iii. Submit the local plan to the Secretary of State for examination together with a schedule of proposed modifications; and

iv. Invite further representations but only on the schedule of modifications.

9.11 This simple change would remove the necessity for authorities to introduce the additional stage of plan making which often takes place (the preferred local plan). It would streamline plan making and enhance meaningful community involvement.

9.12 What is also important, however, is that the community has the opportunity early in the plan making process to engage and express its view about what it wants to see achieved through the local plan. Accordingly, we recommend that the first stage of consultation on a local plan must take place early enough to allow community engagement on a vision and high level options for the local plan area.

Question 3: Do you agree with the proposals to:

a) amend national policy so that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people?

The NPPF, at paragraph 50 bullet point 1, states that local planning authorities should plan for the needs of different groups including for older people and people with disabilities, along with the needs of other groups. To amend national policy as described could imply that greater weight should be given to making provision for older people and people with disabilities than to other groups whereas the focus should be about supporting a range of groups using the Strategic Housing Market Assessment to understand the local priorities as is currently the case. Of more relevance is the way that accessible homes are treated in relation to Local Plan policy. At present the PPG sets out that:

Based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations. There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:

- *the likely future need for housing for older and disabled people (including wheelchair user dwellings)*
- *size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes)*
- *the accessibility and adaptability of existing housing stock*
- *how needs vary across different housing tenures*
- *the overall impact on viability*

EFDC would suggest that, taking into account the Housing White Paper's proposition that the extent of evidence should be reviewed with a view to streamlining what is needed, and recognising the importance of providing equal access to all in respect of housing, the requirement to demonstrate the need for 'Requirement M4(2) (accessible and adaptable dwellings)' should be removed and that

it becomes an automatic requirement in developments in order to ensure the longevity of the social sustainability of all new development and to support equality of choice for all. This would be a more realistic and pragmatic approach to addressing the needs for older and disabled people and would provide choice in both the type and location of development that is available to older people and people with disabilities.

b) from early 2018, use a standardised approach to assessing housing requirements as the baseline for five year housing supply calculations and monitoring housing delivery, in the absence of an up-to-date plan?

Without having an opportunity to see, and make comment on, the methodology proposed it is not possible to respond to this. Notwithstanding this, there is a need for clarification as to how such an approach would apply to local plans, such as that which is currently being prepared by EFDC, which it is anticipated will have been submitted to the Secretary of State for Examination at that point. Very serious consideration also needs to be given to the implications that this may have on areas where groups of authorities have come together and agreed a distribution for housing through mechanisms such as Memorandums of Understanding, having considered the outputs from SHMAs, but where the individual local authorities are working to different timelines for the development of their local plans. This is the case for the local authorities of Epping Forest, Uttlesford, East Hertfordshire and Harlow Districts.

In addition to the above, the introduction of any standardised approach must take into account the time, resources and costs involved as a result of having to revisit work already undertaken through recently published SHMAs as these are all implications of bringing such an approach into effect. To overcome this, serious thought should be given to the potential for providing a freely available toolkit on the lines of that previously developed by the Local Housing Requirement Assessment Working Group on its 'How Many Homes' website, rather than local authorities having to 'start from scratch.'

Question 4

Do you agree with the proposals to amend the presumption in favour of sustainable development so that:

a) authorities are expected to have a clear strategy for maximising the use of suitable land in their areas?;

Such an approach could be read as 'getting as much development on a piece of land as possible regardless of any other considerations'. This could unintentionally dilute the core planning principle currently set out in the NPPF that planning should 'not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives'. It is vital that an appropriate balance is achieved. Whilst it is fully appreciated that the best use should be made of available land, this should not be at the cost of quality of place (both existing and new).

b) it makes clear that identified development needs should be accommodated unless there are strong reasons for not doing so set out in the NPPF?;

EFDC is already very clear of the NPPF position in relation to accommodating identified development needs and would question what difference this would make in practice.

c) the list of policies which the Government regards as providing reasons to restrict development is limited to those set out currently in footnote 9 of the National Planning Policy Framework (so these are no longer presented as examples), with the addition of Ancient Woodland and aged or veteran trees?

This would assist with clarification and interpretation of the NPPF in this regard.

d) its considerations are re-ordered and numbered, the opening text is simplified and specific references to local plans are removed?

It is not clear what benefit there is to removing the reference to 'a golden thread'. This is important in emphasising that the three strands of sustainable development should be taken account of across the spectrum of planning related activities. Furthermore this seems counter to the proposal later on in the White Paper to amend the NPPF to encourage local planning authorities to consider the social and economic benefits of estate regeneration.

Question 5: Do you agree that regulations should be amended so that all local planning authorities are able to dispose of land with the benefit of planning consent which they have granted to themselves?

Yes, although it will be important to ensure that there are appropriate safeguards built in to ensure that there is no public perception of 'bias' in the decision-making process.

Question 6: How could land pooling make a more effective contribution to assembling land, and what additional powers or capacity would allow local authorities to play a more active role in land assembly (such as where 'ransom strips' delay or prevent development)?

It is suggested that local planning authorities should be given powers to reasonably require owners of land, that are key to unlocking developments, to either sell the land or allow access across the land, subject to appropriate levels of compensation being provided by the relevant developer(s). This would align with Compulsory Purchase Order principles.

Question 7: Do you agree that national policy should be amended to encourage local planning authorities to consider the social and economic benefits of estate regeneration when preparing their plans and in decisions on applications, and use their planning powers to help deliver estate regeneration to a high standard?

See response to Question 4 above. Furthermore, as the NPPF makes it clear that sustainable development comprises the three strands of economic, social and environmental sustainability this applies as much to estate regeneration as it does with any other form of planning related proposal, as do bullet point 2 and bullet point 4 of the NPPF Core planning principles which state that planning should:

- Not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives; and

- Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.

Question 8: Do you agree with the proposals to amend the National Planning Policy Framework to:

a) highlight the opportunities that neighbourhood plans present for identifying and allocating small sites that are suitable for housing?;

Yes. This is an important element of planning in local communities and small sites make a real contribution to the delivery of housing and support local building firms and their suppliers. They can also often have more flexibility to achieve design solutions that are responsive to local character as they are not so constrained by development models based on standard house types.

b) encourage local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the authority's housing needs?;

Yes. At present the NPPF separates out the policy framework for rural housing and the rural economy rather than bringing these elements together with a focus on supporting thriving rural communities. This would be more in keeping with the three strands of sustainable development and recognise the challenges that face rural communities which can often be very different from those of urban communities.

c) give stronger support for 'rural exception' sites – to make clear that these should be considered positively where they can contribute to meeting identified local housing needs, even if this relies on an element of general market housing to ensure that homes are genuinely affordable for local people?;

The NPPF already makes provision for this but there could be some benefit in strengthening this further. This would also recognise that there should be opportunities for the provision of housing across both the affordable and private sectors, including for rent, to support the objective of achieving mixed and balanced communities and that there is a need for new housing across all tenures in rural communities, and not just as a mechanism for cross-subsidising the affordable housing element of rural exception sites. However, it is important that the inclusion of market housing is truly to enable rural exception schemes to be viable, and not just to increase the payment to the landowner for a site that otherwise has little value anyway. It is therefore essential that, where an element of market housing is proposed, the proposed developer of a rural exception scheme is required to provide a Viability Appraisal to the local planning authority at the pre-application stage to demonstrate the viability need for the proposed number of market homes.

EFDC has undertaken a number of successful rural exception schemes to date, without the need for any market housing to be included, and its Draft Local Plan reflects the approach suggested above.

d) make clear that on top of the allowance made for windfall sites, at least 10% of sites allocated for residential development in local plans should be sites of half a hectare or less?;

Whilst the principle of this is supported there is a need to consider the potential resource implications for identifying and allocating a potentially larger number of sites. In addition setting a

percentage size requirement on sites may not match the portfolio of potential sites available in all local authority areas across England.

e) expect local planning authorities to work with developers to encourage the sub-division of large sites?; and

Developers of large sites already frequently sub-divide them and ‘sell-on’ to other developers as this minimises financial risk and widens choice and allows for a site to be developed out quicker which reduces a developers longer term financial liabilities. The challenge is whether developers are prepared to sub-divide sites to increase the supply of sites for small and medium-sized housebuilders. Whilst local planning authorities can encourage such an approach if a developer says no there are is nothing further that a local planning authority can do.

f) encourage greater use of Local Development Orders and area-wide design codes so that small sites may be brought forward for development more quickly?.

The mechanisms for taking this approach could have significant resource implications for already stretched local planning authorities and can take time to get in place. Consequently they are more appropriate for larger development sites, including for those which are likely to be sub-divided -as per e) above – to ensure consistency of design ethos and also facilitate speed of delivery for sites with a longer build-out timeframe.

Question 9: How could streamlined planning procedures support innovation and high-quality development in new garden towns and villages?

As set out in the successful Harlow and Gilston Garden Town Expression of Interest submitted by EFDC, East Hertfordshire District Council and Harlow Council (October 2016) the following would support innovative and high-quality development in garden towns and villages:

“Financial & delivery innovation:

The Councils would also welcome the opportunity to discuss possible legislation to support the creation of a high quality Garden Town in an innovative and locally led way. This could involve exploring appropriate delivery vehicle structures to enable local leadership, use of New Town powers, and any other associated powers or flexibilities to address land and funding needs.

Further flexibilities to deliver on Garden City principles in relation to establishing suitable local community ownership and governance structures (such as a community land trust) would also be welcomed. In the context of a wider trend towards the localisation of finance there are also opportunities to create a virtuous cycle of reinvestment not currently available.

Planning flexibilities

In order to achieve their ambition of delivering starts by 2020, the Councils are jointly seeking greater planning freedoms to accelerate the process of bringing sites forward through the planning system. This is in addition to protections around their 5-year land supply, speeding up the engagement with statutory agencies, and closer coordination across the authorities with the Planning Inspectorate.

Local Plan Examinations: A key issue that the Councils will need to face is ensuring Local Plans can make effective progress through examination. The fact that several Local Plans are coming forward in tandem with shared issues between them could pose additional risk, and support from DCLG and PINS would be useful to minimise risk and establish suitable examination programmes. The Councils would like to explore the potential for closer co-ordination and alignment of examination processes across the planning authorities to avoid duplication.

Housing Land Supply: In recognition of the challenges posed in bringing forward strategic sites through the planning system the Councils would like to explore with Government opportunities for greater flexibility in terms of maintaining this supply during the period the Councils are pro-actively focusing resources on accelerating strategic sites through the planning system. This will enable the delivery focus to remain driving forward long-term sustainable growth rather than dealing with speculative planning applications and related appeals. In addition and related to financial flexibilities, it may be helpful to explore whether planning processes could be streamlined in any way to enable delivery to come forward effectively and efficiently, potentially aligned to any amendments to New Towns legislation”

Question 10: Do you agree with the proposals to amend the National Planning Policy Framework to make clear that:

a) authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements?

Yes, although this is already the approach that EFDC has pursued.

b) where land is removed from the Green Belt, local policies should require compensatory improvements to the environmental quality or accessibility of remaining Green Belt land?

Whilst the objective behind this is understood, and very much supported, it is not clear how this would work in practice. If neither the applicant nor the local authority has control over any remaining Green Belt land then there would be no powers through which such a requirement could be brought into effect. Introducing such a requirement could result in placing unreasonable burdens on development and have the unintended consequence of delaying development. Furthermore, facilitating this could be contrary to the NPPF in respect of material changes of use within the Green Belt (see response to the next question).

c) appropriate facilities for existing cemeteries should not to be regarded as ‘inappropriate development’ in the Green Belt?

It is not clear why this is being proposed as the NPPF already makes provision for this at paragraph 89, bullet point 2. More importantly there is an opportunity to address the issues in relation to ‘material changes of use’ as identified in the findings of the Court of Appeal in the case of R (Timmins and Lymn Family Funeral Service) v. Gedling Borough Council and Westerleigh Group Limited [2015 EWCA Civ 110]. In that case views were expressed regarding changes between Planning Policy Guidance 2 and the NPPF in relation to material changes of use in the Green Belt. Differing views were expressed that any change of use of land to use as a cemetery would now be inappropriate. This could also apply to material changes of use for outdoor sport, outdoor

recreation and the like. However, paragraph 81 of the NPPF advises local planning authorities that they should plan positively for to enhance the beneficial use of the Green Belt and makes references to outdoor sport and outdoor recreation. It is this matter that needs to be addressed, and an amendment to the NPPF in this regard would resolve this issue and overcome potential tensions between paragraphs 81 and 89 of the NPPF.

d) development brought forward under a Neighbourhood Development Order should not be regarded as inappropriate in the Green Belt, provided it preserves openness and does not conflict with the purposes of the Green Belt?

Paragraph 90 bullet 5 of the NPPF already treats development brought forward under a Community Right to Build Order as not inappropriate in the Green Belt subject to the same tests as noted above. A Community Right to Build order is a special type of Neighbourhood Development Order that enables small scale development. Whilst extending the category of not inappropriate development in the green belt to all Neighbourhood Development Order may potential allow for larger scale development than that envisaged by the Community Right to Build Order this is not likely in and of itself to create significantly different development forms in the Green Belt than are already considered 'not inappropriate' . It is therefore difficult to envisage what material difference would be made by the inclusion of development brought forward under any Neighbourhood Development Order into this category of development – given that they are subject to independent examination.

e) where a local or strategic plan has demonstrated the need for Green Belt boundaries to be amended, the detailed boundary may be determined through a neighbourhood plan (or plans) for the area in question?

Yes. This would remove the current barriers for local communities in Green Belt areas to address local need which goes beyond the provision of predominantly affordable housing through rural exception sites.

f) when carrying out a Green Belt review, local planning authorities should look first at using any Green Belt land which has been previously developed and/or which surrounds transport hubs?

Taking a sequential approach such as this may not necessarily provide the right 'starting point' for a Green Belt Review. There may be other locations for development within the Green Belt, which, when having been assessed against the five purposes of the Green Belt together with other criterion, would be preferable in achieving broader planning objectives. Therefore Green Belt reviews should be undertaken based on local evidence rather than a nationally prescribed sequence of assessment. For example, once it is clear that there is a need to release Green Belt land it can provide the opportunity, through its location, to create sustainable and accessible communities, including through opportunities to create good transport access to services and employment where none currently exists (as opposed to focusing purely on existing transport hubs). This provides the opportunity to take a strategic approach to Green Belt land release for the wider benefit of the area and in the public interest rather than being 'directed' to areas of land which would not in reality support the proper planning of a place i.e. supports the principles of sustainable development.

In developing plans it is vital that there is a proper assessment of the sustainability benefits (as well as the dis-benefits) of Green Belt release alongside the consideration of the five purposes of the

Green Belt and that this is undertaken in as strategic a manner as possible. For example, it is understood that the Mayor of London has indicated that there will be no review of London's Green Belt as part of the development of the next London Plan. However, this failure to undertake an assessment of the sustainability impact of not reviewing the Green Belt is likely to have serious implications for local authority areas such as Epping Forest District and on Greater London . Consequently, there should perhaps be greater encouragement given to considering the sustainability benefits of a review, including enhancing accessibility, rather than focusing on what is currently 'on the ground'.

Question 11: Are there particular options for accommodating development that national policy should expect authorities to have explored fully before Green Belt boundaries are amended, in addition to the ones set out above?

No.

Question 12: Do you agree with the proposals to amend the National Planning Policy Framework to:

a) indicate that local planning authorities should provide neighbourhood planning groups with a housing requirement figure, where this is sought?;

It is recognised that this would be welcomed by some neighbourhood plan groups. However, the practicalities of doing this are such that it is not necessarily a straightforward exercise. This is because population and household projections are not produced below district/borough/unitary level and therefore an extrapolation of these projections would not necessarily accurately reflect local need or be achievable from a technical perspective. This is why part of the evidence base that neighbourhood planning groups develop in relation to local need is developed by conducting local housing surveys so that they can develop of a clear understanding of their own locally based housing requirement figure.

b) make clear that local and neighbourhood plans (at the most appropriate level) and more detailed development plan documents (such as action area plans) are expected to set out clear design expectations; and that visual tools such as design codes can help provide a clear basis for making decisions on development proposals?;

Yes, although the development of design codes would need to be proportionate to the scale of development proposed as the costs of doing so could be significant and there may be challenges in terms of the availability of skills.

c) emphasise the importance of early pre-application discussions between applicants, authorities and the local community about design and the types of homes to be provided?;

In principle, yes. However, care needs to be taken that this does not impact on the ability to ensure that the mix and type of homes to be provided achieves the creation of mixed and balanced communities, including for the provision of affordable housing. In addition this appears to suggest that these are the only matters of concern for local communities. For example the provision of local infrastructure that supports the successful integration of a development within the local community and properly mitigates its impacts is often a real concern for local communities. Local communities

can be an invaluable resource in helping to understand 'how a place ticks' and how best this can be achieved and therefore the approach proposed should also reflect this aspect of development.

d) makes clear that design should not be used as a valid reason to object to development where it accords with clear design expectations set out in statutory plans?; and

This would depend on how fine-grained the design expectations are - the consideration of local character is very different even within a relatively small geographic area – such a detailed approach may not be proportionate and undertaking the analysis work to develop those expectations could result in delays in plan-making.

e) recognise the value of using a widely accepted design standard, such as Building for Life, in shaping and assessing basic design principles – and make clear that this should be reflected in plans and given weight in the planning process?

Yes. There would be merit in amending the requirements for Design and Access Statements to refer to the Building for Life criterion particularly as organisations such as the Home Builders Federation were involved in the development of Building for Life 12.

Question 13: Do you agree with the proposals to amend national policy to make clear that plans and individual development proposals should:

a) make efficient use of land and avoid building homes at low densities where there is a shortage of land for meeting identified housing needs?;

Yes in relation to making efficient use of land (within the context of other policies in the NPPF). However, even in places where there is a shortage of housing land consideration still needs to be given to matters such as the relationship with designated heritage assets (and other matters that are contained in the proposed change to include Footnote 9 into the body of the NPPF) i.e. it should not be about 'development at all costs'. Placing emphasis on making efficient use of land should be the primary focus. How this is assessed and achieved should be for local planning authorities to determine within the context of individual schemes. Again, this could be included as a 'test' in Design and Access Statements.

b) address the particular scope for higher density housing in urban locations that are well served by public transport, that provide opportunities to replace low-density uses in areas of high housing demand, or which offer scope to extend buildings upwards in urban areas?;

This should be a matter based on local circumstance as the proposition assumes that urban locations that are well served by public transport can automatically accommodate higher density housing as is set out in the next question. Furthermore, many communities have concerns regarding the impact on local character that current Permitted Development Rights (PDR) creates through incremental, ad hoc change. Building upwards should not be the subject of extended PDR to ensure that matters such as character and impacts on living conditions can properly be assessed. Furthermore, one of the unintended consequences of current PDR has been a loss in housing stock of smaller properties, particularly in high value areas, and a significant reduction in the stock of more affordable market housing.

c) ensure that in doing so the density and form of development reflect the character, accessibility and infrastructure capacity of an area, and the nature of local housing needs?;

This is essential and would address the concerns set out above.

d) take a flexible approach in adopting and applying policy and guidance that could inhibit these objectives in particular circumstances, such as open space provision in areas with good access to facilities nearby?

In principle, yes. However, this should be assessed in terms of the capacity of existing facilities and the ability to increase that capacity to accommodate new users and to provide for improved access from a development where that doesn't necessarily currently exist, not just to those that have good access. There is also a wider benefit that should be recognised in that it provides for the opportunity for the greater integration of existing and new communities/residents which supports the social dimension of sustainable development.

Question 14: In what types of location would indicative minimum density standards be helpful, and what should those standards be?

Taking such an approach would be extremely prescriptive and does not reflect Government's stated desire for local communities to have more say in the design and type of housing to be provided. Both of these aspects can have an impact on density. The proposition would provide a 'one size fits all' approach which would not necessarily reflect local circumstances and local character. For example, setting minimum densities for development in areas in close proximity to a railway station could pose difficulties if this is located in a historic centre which has a low density character. Whilst this could be dealt with by exception, it would be preferable to strengthen the need for an applicant to demonstrate that the design and density of the proposal makes best use of land and makes a positive contribution to the local area in design terms. This would provide for local circumstances to be taken into account but make it clear what the 'tests' should be. This type of approach was always seen to be part of the function and purpose of Design and Access Statements. There would therefore be an opportunity to make more explicit what a Design and Access Statement should include in relation to density and making best use of land.

Question 15: What are your views on the potential for delivering additional homes through more intensive use of existing public sector sites, or in urban locations more generally, and how this can best be supported through planning (using tools such as policy, local development orders, and permitted development rights)?

Existing public sector sites should be the subject of the same considerations as any other site. Taking such an approach as that suggested could create a perception that if it is public land then it will be allowed to squeeze as many homes on as possible in order to maximise the money that can be made even if it is an unsustainable location.

Question 16: Do you agree that:

a) where local planning authorities wish to agree their housing land supply for a one year period, national policy should require those authorities to maintain a 10% buffer on their 5 year housing land supply?;

No. There appears to be a ‘misconception’ regarding land identified in the 6-10 year period of a Local Plan and its availability to be developed earlier in the plan period in order to maintain a buffer. EFDC, in developing its plan, assesses the likely timescale for development coming forward based on information from landowners and/or developers (as there may be good reasons, such as the expiry of existing leases, which prevent a site being available earlier in the local plan period), and on the timescales of any necessary infrastructure coming forward.

b) the Planning Inspectorate should consider and agree an authority’s assessment of its housing supply for the purpose of this policy?

Yes. However, EFDC has concerns as to the capacity of the Planning Inspectorate to do so and would not wish to see assessments being undertaken by others such as is done in assessing, for example, Neighbourhood Plans. This is because it is important that there is as much control as possible in achieving a consistency of approach which is best achieved through the Planning Inspectorate.

c) if so, should the Inspectorate’s consideration focus on whether the approach pursued by the authority in establishing the land supply position is robust, or should the Inspectorate make an assessment of the supply figure?

The focus should be on ensuring the authority’s position is robust.

Question 17: In taking forward the protection for neighbourhood plans as set out in the Written Ministerial Statement of 12 December 2016 into the revised NPPF, do you agree that it should include the following amendments:

a) a requirement for the neighbourhood plan to meet its share of local housing need?;

Yes. If the Neighbourhood Plan in question addresses this matter – the range of neighbourhood plan content means that this is not always a matter included in a plan which may deal rather with matters such as design or community facilities.

b) that it is subject to the local planning authority being able to demonstrate through the housing delivery test that, from 2020, delivery has been over 65% (25% in 2018; 45% in 2019) for the wider authority area?

EFDC has no view on this.

c) should it remain a requirement to have site allocations in the plan or should the protection apply as long as housing supply policies will meet their share of local housing need?

The protection test for out of date policies for a Neighbourhood Plan (from the Ministerial Statement 12 December 2016) includes site allocations within the Neighbourhood Plan. However, there is no general requirement for Neighbourhood Plans to include allocations. The Council does not have a view on this question although for consistency an allocations test should not apply.

Question 18: What are your views on the merits of introducing a fee for making a planning appeal? We would welcome views on:

- a) how the fee could be designed in such a way that it did not discourage developers, particularly smaller and medium sized firms, from bringing forward legitimate appeals;
- b) the level of the fee and whether it could be refunded in certain circumstances, such as when an appeal is successful; and
- c) whether there could be lower fees for less complex cases.

This proposal is not supported by EFDC as it is contrary to the principles of natural justice and could potentially discourage those who are reasonably appealing a decision and who have no other course of action. The practicality of implementation, for example, the suggestion of providing refunds, and the actual cost of administering this are also questioned.

Question 19: Do you agree with the proposal to amend national policy so that local planning authorities are expected to have planning policies setting out how high quality digital infrastructure will be delivered in their area, and accessible from a range of providers?

Yes in principle to the delivery of digital infrastructure if this is linked to new development although it should be noted that this can be a challenge for more rural areas. The issue of delivery of high quality digital infrastructure not related to new developments and accessibility to a range of providers are not planning matters but should be dealt with through Ofcom Regulation. As can be demonstrated, EFDC recognises the importance of the provision of high quality digital infrastructure which is why its Draft Local Plan has a policy on Communications Infrastructure which sets out that:

'The Council will promote enhanced connectivity of the District through supporting infrastructure for high speed broadband and telecommunications. In particular applicants submitting major development proposals should demonstrate how high speed broadband infrastructure will be accommodated within the development.'

Question 20: Do you agree with the proposals to amend national policy so that:

- the status of endorsed recommendations of the National Infrastructure Commission is made clear?; and

Yes. This would be a helpful clarification.

- authorities are expected to identify the additional development opportunities which strategic infrastructure improvements offer for making additional land available for housing?

EFDC would suggest that there is a need to look at this in a different way. The opportunity for making land available for housing if strategic infrastructure improvements are made is a key element in developing local plans. But they are often dependent on infrastructure providers being proactive in supporting such allocations through the provision of strategic infrastructure. The provision of a new Junction on the M11 motorway is a case in point. The land to deliver a significant amount of housing around Harlow has been identified but will only be unlocked if this infrastructure is provided. Therefore there is a need to ensure that infrastructure providers recognise the importance of their role in helping to deliver the housing needed and that, where this involves government agencies, that their own funding mechanisms and planning are responsive to achieving this.

Question 21: Do you agree that:

a) the planning application form should be amended to include a request for the estimated start date and build out rate for proposals for housing?

Yes.

b) that developers should be required to provide local authorities with basic information (in terms of actual and projected build out) on progress in delivering the permitted number of homes, after planning permission has been granted?

Yes.

c) the basic information (above) should be published as part of Authority Monitoring Reports?

Yes.

d) that large housebuilders should be required to provide aggregate information on build out rates?

Yes.

EFDC would also wish to recommend that there is a requirement for landowners/developers who are promoting development sites through local plans to also be required to submit information regarding the estimated start date and build out rate for the site. This information is critical in developing a local plan housing delivery statement and trajectory and to inform Infrastructure Delivery Plans. This information should be in the public domain and when considering both five year housing land supply and the proposed housing delivery test this would provide a much clearer base for holding developers to account when not bringing sites forward in accordance with the evidence provided to support the plan-making process. It would also provide a much clearer link between the plan-making and decision-taking parts of the planning process.

Question 22: Do you agree that the realistic prospect that housing will be built on a site should be taken into account in the determination of planning applications for housing on sites where there is evidence of non-implementation of earlier permissions for housing development?

Whilst EFDC understands and supports what Government is seeking to achieve this could have unintended consequences. There may be good reasons why an earlier permission was not implemented and this could impact on delivery.

Question 23: We would welcome views on whether an applicant's track record of delivering previous, similar housing schemes should be taken into account by local authorities when determining planning applications for housing development.

As with Question 22 above, EFDC understands and supports what Government is seeking to achieve. However, the Council is concerned as to how this would work in practice. Would this relate only to sites within its own area or across England? If the latter then where would the responsibility lie in terms of providing the information? If it is to lie with the local planning authority this creates an additional burden and it is not clear how such information could be accessed. There could also be

potentially significant opportunities for challenge. Consideration would also need to be given as to whether this would apply to a local authority which was making an application on its own land with a view to selling a site on with planning permission, as is being proposed elsewhere. Some may challenge that there is one rule for one and one rule for another.

Question 24: If this proposal were taken forward, do you agree that the track record of an applicant should only be taken into account when considering proposals for large scale sites, so as not to deter new entrants to the market?

Yes.

Question 25: What are your views on whether local authorities should be encouraged to shorten the timescales for developers to implement a permission for housing development from three years to two years, except where a shorter timescale could hinder the viability or deliverability of a scheme? We would particularly welcome views on what such a change would mean for SME developers.

As SMEs tend to bring forward smaller sites for development these are often less complicated and unlikely to be subject to the same infrastructure requirements and timescales for implementation as major sites. In addition they often have more challenges in relation to cash flow than major developers and therefore are keen to develop a site out more quickly. Consequently, such a change would be unlikely to be unduly onerous for SMEs.

Question 26: Do you agree with the proposals to amend legislation to simplify and speed up the process of serving a completion notice by removing the requirement for the Secretary of State to confirm a completion notice before it can take effect?

Yes.

Question 27: What are your views on whether we should allow local authorities to serve a completion notice on a site before the commencement deadline has elapsed, but only where works have begun? What impact do you think this will have on lenders' willingness to lend to developers?

This should be introduced. EFDC does not feel it is sufficiently informed to make comment on the impact this may have on a lenders willingness to lend to developers.

Question 28: Do you agree that for the purposes of introducing a housing delivery test, national guidance should make clear that:

a) The baseline for assessing housing delivery should be a local planning authority's annual housing requirement where this is set out in an up-to-date plan?

No. This should not be based on the annual requirement but on the level of housing shown in the housing trajectory developed to support the local plan, not on the basis of an annualised average which is an artificial method of assessment and does not reflect the realities of how housing development is brought forward over a period of time. This is already recognised in Paragraph A.112 (page 96) of the White Paper in relation to the peaks and troughs in build out rates from one year to the next.

b) The baseline where no local plan is in place should be the published household projections until 2018/19, with the new standard methodology for assessing housing requirements providing the baseline thereafter?

This would be dependent upon the methodology – please refer to the councils response to Question 3b.

c) Net annual housing additions should be used to measure housing delivery?

In principle, yes. However, this would preclude the ability to take into account the effect of estate regeneration which could, as a result of timing, significantly reduce the net number of additions in one year as a result of demolition works prior to completions coming on stream. This would give an inaccurate reflection of delivery.

d) Delivery will be assessed over a rolling three year period, starting with 2014/15 – 2016/17?

See response to Question 29 below.

Question 29: Do you agree that the consequences for under delivery should be:

a) From November 2017, an expectation that local planning authorities prepare an action plan where delivery falls below 95% of the authority’s annual housing requirement?;

b) From November 2017, a 20% buffer on top of the requirement to maintain a five year housing land supply where delivery falls below 85%?;

c) From November 2018, application of the presumption in favour of sustainable development where delivery falls below 25%?;

d) From November 2019, application of the presumption in favour of sustainable development where delivery falls below 45%?; and

e) From November 2020, application of the presumption in favour of sustainable development where delivery falls below 65%?

If this is linked to an adopted local plan trajectory and the local planning authority can demonstrate that the information provided by developers has not been accurate/robust then there should be some form of requirement for the landowner/promoter/developer to be brought to account. Local Plans are the mechanism for identifying the number of homes needed and the land that has been identified to achieve this, and is properly tested through examination. Local planning authorities cannot force a landowner/developer to submit a planning application or commence its implementation, nor can they force infrastructure providers to deliver critical infrastructure to unlock sites. Consequently, if there is an up-to-date local plan in place then the approach advocated above could undermine the local plan process and the confidence for local communities in the plan led system and their role in it.

Question 30: What support would be most helpful to local planning authorities in increasing housing delivery in their areas?

Developers making applications and bringing forward development when they have advised they would through the plan-making process, a more proactive approach by infrastructure providers, such as Highways England and Utility Companies, to align investment and delivery plans with the timescales identified in local plans and associated Infrastructure Delivery Plans (which have been developed based on discussions with infrastructure providers at that stage) as to when it is needed.

It would also help if national guidance on the detailed methodology to be adopted for viability appraisals could be provided, to give certainty to both developers and local planning authorities and to avoid protracted discussions and negotiations which, undoubtedly lead to delays in bringing sites forward.

Question 31: Do you agree with our proposals to:

a) amend national policy to revise the definition of affordable housing as set out in Box 4?;

- It is suggested that, since the proposal that “affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision” appears to apply to all affordable housing (not just “social rented and affordable rented housing”), this sentence should be moved to the paragraph above on “Affordable housing”
- It seems strange that Government appears to be saying that local planning authorities “should also include income restrictions which limit a person’s eligibility to purchase a starter home to those who have maximum household incomes of £80,000 a year or less (or £90,000 a year or less in Greater London)”. It is suggested that this should simply be a requirement included within the NPPF, with which all local planning authorities must comply, which would also make it easier to update for both Government and local planning authorities.
- EFDC is of the view that it would be inappropriate to introduce a new definition of affordable housing relating to “discounted market sales housing”, which is very similar to the definition and requirements of Starter Homes, but without the clarity and rules relating to Starter Homes – such as the 15 year discount repayment period for Starter Homes proposed within the White Paper. Therefore, since it is proposed in the White Paper that both Starter Homes and “discounted market sales housing” should be sold at a discount of at least 20%, it is suggested that there is no need for the latter product.

b) introduce an income cap for starter homes?;

This is supported.

c) incorporate a definition of affordable private rent housing?;

Although this is supported in principle, we feel that there is a need to better explain the reason and rationale for introducing a further form of affordable housing that is very similar to affordable rented housing (i.e. at least 20% below local market rents).

d) allow for a transitional period that aligns with other proposals in the White Paper (April 2018)?

This is sensible.

Question 32: Do you agree that:

a) national planning policy should expect local planning authorities to seek a minimum of 10% of all homes on individual sites for affordable home ownership products?

Yes – provided that local planning authorities can specify, through their local plans or other local planning documents, what form of affordable housing products are required – either within the District generally or on specific proposed development sites.

b) that this policy should only apply to developments of over 10 units or 0.5ha?

Since the NPPF's general requirement for the provision of affordable housing on sites is that it now only applies to developments in excess of 10 units, it is felt that, for practical reasons, the threshold for affordable home ownership products should only apply to larger sites.

For example, if a local planning authority's affordable housing target is, say, 30% - and 10% of affordable homes are required to be provided as an affordable home ownership product – a development of 11 units would require "0.33" units to be provided as an affordable home ownership product. In practical terms, for the delivery of affordable home ownership properties to be viable, it is suggested that the absolute minimum number that could be provided on a site would be around 3 homes.

It is therefore suggested that the proposed threshold for affordable home ownership properties should be amended to apply to developments of over 50 units.

Question 33: Should any particular types of residential development be excluded from this policy?

No

Question 34: Do you agree with the proposals to amend national policy to make clear that the reference to the three dimensions of sustainable development, together with the core planning principles and policies at paragraphs 18-219 of the National Planning Policy Framework, together constitute the Government's view of what sustainable development means for the planning system in England?

It is not clear what this is trying to achieve as this is already set out in the NPPF.

Question 35: Do you agree with the proposals to amend national policy to:

a) Amend the list of climate change factors to be considered during plan-making, to include reference to rising temperatures?

Yes.

b) Make clear that local planning policies should support measures for the future resilience of communities and infrastructure to climate change?

Yes.

Question 36: Do you agree with these proposals to clarify flood risk policy in the National Planning Policy Framework?

Yes.

Question 37: Do you agree with the proposal to amend national policy to emphasise that planning policies and decisions should take account of existing businesses when locating new development nearby and, where necessary, to mitigate the impact of noise and other potential nuisances arising from existing development?

Yes. Whilst this is a matter which EFDC has already taken into account in its Regulation 18 Draft Local Plan, amending national policy to strengthen the need to take such matters into consideration would be welcomed. This is particularly pertinent taking into account the Government's desire to make best use of previously developed land and land in urban areas.

Question 38: Do you agree that in incorporating the Written Ministerial Statement on wind energy development into paragraph 98 of the National Planning Policy Framework, no transition period should be included?

EFDC has no views on this matter.

Planning Fees

The Council welcomes the increase in planning application fees and is committed to spending the additional income on planning functions. However, EFDC wish to advise that the increase in planning application fees would be insufficient to cover the current cost of the Development Control Service. Therefore, whilst the additional fee income would support an enhancement of the Service at no extra cost to Council Tax payers, those payers are part funding and will continue to, part fund the service even though the majority of them do not use the service. In the context of the move towards local authorities becoming financially 'self-sufficient' from 2020 onwards, charges for planning applications are, as far as the Council is aware, the only service where fees are still set nationally. EFDC would therefore strongly request that Government reviews its position on this matter. Furthermore, this does not take into account the costs of the plan-making process which is not just about the development of EFDC's Local Plan, but also other activities such as the Masterplanning of strategic sites which seek to ensure the speedy delivery of the high quality housing that the District needs.'

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Report to Neighbourhood Select Committee

Date of meeting: 21 March 2016

Subject: Update Local Plan

Officer contact for further information: Alison Blom-Cooper
Ext 4066

Committee Secretary: A Hendry ext 4246



Recommendations/Decisions Required:

To note the update on the Local Plan

Report:

1. The formal 6 week Regulation 18 consultation on the Draft Local Plan finished on 12 December 2016. Since the Council decision to consult on the Draft Local Plan on 18 October 2016, Draft Local Plan policies are being treated as a material planning consideration when determining planning applications. The Planning Policy Team has provided a guidance note to officers in Development Management to ensure consistency of approach and this is available on the Council's website.

2. The report to Cabinet on 9 March 2017 sets out the initial high level findings from the consultation. Appendix A of the report prepared by Remarkable summarises the key points that have been noted from the analysis of the questionnaire responses which represent about half of the total responses received to the consultation. Appendix B provides a summary of responses from National Bodies, Town and Parish Councils and Local Planning Authorities. Further work is currently being undertaken to fully analyse all of the responses received, including the 'written verbatim' responses received either as part of the free text in the questionnaire, or as a standalone report, letter or email. Part of this work will be reviewing the responses to the consultation received from site promoters, landowners and developers. Most of these are from those promoting sites for inclusion within the Local Plan. The issues raised by them will be considered in further detail to inform further site selection work and the pre Submission Plan.

3. The Council has set up Developer Forums to engage with promoters of those sites which are being proposed for allocation within the Draft Local Plan in order to provide a basis for the long term planning and implementation of sites proposed for allocation (see below). It is vitally important that the Council liaises closely on an ongoing basis with relevant landowners and promoters of sites proposed for allocation within the Draft Plan, and other stakeholders as required, in order to demonstrate that the Local Plan will be 'effective' and therefore can be found to be 'sound' in due course at Examination-in-Public. Importantly, it will also help to ensure that a joined up and 'frontloaded' approach is taken to the masterplanning, design, phasing and delivery of sites proposed for allocation, as well as ensuring that Council resources are used in the most effective way possible.

4. A further detailed report will be provided to Cabinet following the conclusion of the analysis of all responses received. The Council will also be making all responses available for public inspection as soon as possible following the completion of the analysis. Further details in relation to arrangements for inspecting consultation responses will be made available in due course. The team will be considering the details of all the representations to determine whether or not changes to the Draft Local Plan are required or additional evidence is needed

to inform the preparation of the Pre-submission (Regulation 19) Plan. Should the sites proposed for allocation as part of the emerging Local Plan change, the membership of the Development Forums will need to change accordingly.

Next steps for the preparation of the Pre Submission Plan

5. Following consideration and further analysis of the comments received in response to the Draft Local Plan consultation, the next stage will be to prepare a plan for publication and to publish it under Regulation 19. This will be the document that the Council considers is ready for examination. The Publication Plan must be published together with other “proposed submission documents”, for a six-week period to seek stakeholder representations as to the soundness and legal compliance of the Plan before it can be submitted to the Planning Inspectorate for examination. However, should any significant alterations be made to the strategy and approach set out within the Draft Local Plan, the Council may first be required to undertake additional consultation under the Regulation 18 stage.

6. A new project plan has been developed to programme the work for the Planning Policy Team, other Council specialists and consultants working on the plan up until the Regulation 19 publication. This has taken into account the analysis so far undertaken on comments to the Draft Local Plan and has been used to develop a new timeline for the work.

7. The key issues in managing the programme relate to resources, the ability of external organisations such as Essex County Council in providing timely inputs into plan preparation largely outside our control and the interconnectivity of the various workstreams. The importance of maintaining a full team of appropriately skilled and effective officers and consultants cannot be underestimated and there have been resource concerns with staff leaving/going on maternity leave. In addition the avoidance of diversion of resource to other tasks is a key concern yet matters such as neighbourhood plan advice, development monitoring and assistance do need to be provided. The key workstreams are:

- Update of employment land review to feed into the further site selection work
- Transport modelling
- Local plan viability work
- Joint work to update the employment need within the Functional Economic Market Area and the District to inform the work on site selection
- Sustainability Appraisal and Habitat Regulations Assessment
- Retail evidence to assess the impact of recent developments outside of the District (including at Chelmsford and Westfield)
- Site Selection work taking account of new sites submitted and comments received
- Further work on the Infrastructure Delivery Plan
- Open Space Study, Indoor Sports and Playing Pitch Strategy
- Working with site promoters on proposed allocations
- Coordinating work with the Garden Town project

Developer Forum

8. A Developer Forum has been established alongside the progression of the Draft Local Plan to provide a basis for ongoing discussions with relevant landowners, site promoters and stakeholders. It is important that the Council liaises closely on an ongoing basis with relevant landowners and promoters of the sites proposed for allocation within the Draft Local Plan, and with other stakeholders as required in order to:

- i. Demonstrate that the Local Plan is ‘effective’ and that the allocations in the Local Plan will be viable and deliverable, and therefore meet the ‘tests of soundness’ at Examination in Public; and

- ii. Ensure that a joined up and 'frontloaded' approach is taken to the planning and delivery of the development of sites proposed for allocation and associated infrastructure, including promoting joint working for sites in multiple ownership, or adjacent allocations.

9. The Developer Forum is split into two groups, one to address the Strategic Sites around Harlow, and the other to consider those that are subject to a draft allocation across the rest of Epping Forest District. Two rounds of meetings have been held to date. The areas discussed are summarised as below:

Developer Forum – 2 December 2016

10. An introduction to the Draft Local Plan was provided, including the consultation period (which was still open at this point). Particular attention was drawn to Draft Policies SP 3 and SP 4, and the proposed requirement for allocations in the Local Plan to be supported by Strategic Masterplans in appropriate circumstances. A discussion was held in relation to the importance of ensuring a joined up and collaborative approach to the planning and delivery of sites through Masterplans (where appropriate) and quality review, as well as the need to consider how to ensure effective use of resources and processes through the use of Planning Performance Agreements.

11. An overview of the preparation of the further evidence required to support the progress of the Local Plan to Pre-Submission and further to Submission to the Planning Inspectorate was provided. This also included an update on cross boundary strategic working across the Housing Market Area, and that which is addressed by the Cooperation for Sustainable Development Officer/Member groups.

12. Finally, the draft Terms of Reference were presented with an opportunity for discussion. Subsequent to the meeting those in attendance were provided with a further opportunity to comment.

Developer Forum – 24 February 2017

13. The Terms of Reference set out that meetings will be held at least quarterly. This second round of meetings agreed the final version of the Terms of Reference, which are attached to this report.

14. An update was provided on the Garden Town Programme, and the award of funding to EFDC, Harlow Council and East Herts District Council to deliver the growth required.

15. Officers provided an update on the initial analysis of responses to the Draft Local Plan consultation period (see subsequent Cabinet Report 9 March 2017), followed by an update on further evidence base work that is currently underway. This included an overview of the Employment Land Review, Site Selection work, Transport Modelling and preparation of the Infrastructure Delivery Plan. An overview of the proposed timetable for the further preparation of the Local Plan was provided, in addition to an update on the Memoranda of Understanding.

16. Officers from Harlow and East Herts District Councils were present to provide updates on their current positions to the group addressing the Strategic Sites around Harlow. Harlow Council have made clear they are currently reviewing the current objections held to the inclusion of sites to the south and west of Harlow, within Epping Forest District, in the Epping Forest District Draft Local Plan. East Herts District Council intend to submit their Plan for Examination on 31 March 2017.

17. A discussion was held in relation to the potential mechanisms that may be established to ensure the timely and effective implementation of the allocations contained within the Local Plan in due course (subject to the progression of the Local Plan and any changes that may occur). Draft Policies SP 3 and SP 4 identify a requirement for Strategic Masterplans. It is considered that early Planning Performance Agreements could provide an appropriate

mechanism to manage the resources required to implement this work. The Strategic Masterplans are highly likely to be heavily influenced by the need for infrastructure provision, and as such will be interlinked to the preparation of the Infrastructure Delivery Plan. Further consideration is now to be given to the sites that will be required to deliver a Strategic Masterplan, the scope and nature of the Masterplan process, and the scope and nature of Planning Performance Agreements. For Strategic Sites that are proposed for allocation around Harlow there is a need to consider and define how the processes of the Developer Forum will relate to the work associated with the Garden Town (see below). The need to ensure close working with East Herts and Harlow through the Developer Forum was acknowledged by all.

18. A further brief discussion was held on the recently published Housing White Paper.

Revised timetable for the Local Plan

19. The Localism Act 2011 amended the provisions set out in the Planning & Compulsory Purchase Act 2004. However, S111 maintains the requirement that a local authority must prepare and maintain a scheme to be known as their Local Development Scheme. The scheme should specify the local development documents which are to be development plan documents, the subject matter and geographical area for each development plan document, and the timetable for them. Essentially the Local Development Scheme (LDS) lists and programmes the documents that will be produced by a Local Authority. Although there is no longer a requirement for this to be submitted to the Secretary of State, new provisions in the Act state that the local planning authority must make the following available to the public:

- the up to date text of the scheme;
- a copy of any amendments made to the scheme; and
- up to date information showing the state of the authority's compliance with the timetable set out in the scheme.

20. The last Local Development Scheme was formally adopted by the Council in July 2016. This set out the proposed programme for the preparation of a single document – the Epping Forest District Local Plan which will provide a framework for the future development of the District for the period up to 2033. The Plan will contain the strategic vision and policies, site allocations and development management policies. There is no longer a requirement for the Local Development Scheme to list any proposed supplementary planning documents or the statement of community involvement.

21. A revised Local Development Scheme was considered by the Cabinet on 9 March 2017 with the preparation of the single district wide local plan scheduled for submission to the Secretary of State for potential examination, in May 2018.

Neighbourhood Plans:

22. Planning Policy are currently reviewing the resources available to support Neighbourhood Planning. Whilst this review is underway the website is being updated to reflect the most recent changes to regulations around Neighbourhood Planning. A revised note of the support currently available from external sources is provided, in addition to a named contact within the Planning Policy team for enquiries.

23. Designation of the whole of the North Weald Bassett Parish Area as a Neighbourhood Area has been implemented. This now takes in the area previously excluded by Epping Forest District Council forming part of the strategic proposals south of Harlow and west of the M11. The action follows an application by the Parish Council resulting from a change in the Neighbourhood Planning (general) and Development Management Procedure Order Regulations 2016 wherein designation of a neighbourhood area covering a whole parish is effectively made automatic – removing the ability of Councils to modify neighbourhood areas. There has been no change to the Basic Condition that the Neighbourhood Plan must be in

general conformity with the strategic policies of the development plan for the area.

Housing White Paper

24. The Government published the Housing White Paper '*Fixing Our Broken Housing Market*' on 7 February 2017. This sets out a broad range of reforms that Government plans to introduce to help reform the housing market and increase the supply of new homes. The White Paper includes proposals which may, in time, impact upon the production of Local Plans. However, in many cases the Government has committed to consulting on proposals prior to implementing specific changes to National Planning Policy or Regulations. The proposals in the Housing White Paper are not considered to materially impact upon the proposed modifications to the Local Plan at the current time.

25. Many of the changes involve amendments to the National Planning Policy Framework. The Government intends to publish a revised Framework later this year which will consolidate the outcome from previous and current consultations and will incorporate changes to reflect changes made to national policy through Written Ministerial Statements since March 2012.

26. The White Paper sets out consultation questions where new proposals are being made – please see separate report to Neighbourhoods Select Committee which sets out the proposed response from this Council.

Garden Town Funding

27. The Council was successful (together with East Herts and Harlow Councils) in securing £500,000 Garden Towns funding from DCLG for the Harlow and Gilston Garden Town to support the delivery of strategic sites in and around Harlow. This includes the four strategic sites to the South, West and East of Harlow in this District. A joint delivery team is being established with EFDC as the lead authority and the post of Project Director is currently being recruited.

Community Housing Fund

28. The Council has also been allocated funding by DCLG to support community led housing developments. The total sum allocated is £32,211 with 50% paid for 2016/17 and a further tranche available subject to satisfactory evidence that the money is being spent in accordance with the objectives. Officers are working with colleagues from East Herts and Uttlesford District Councils, with the support of ATLAS, to collaborate on the use of the funds received across.

Reason for decision: not applicable

Options considered and rejected: not applicable

Consultation undertaken:

Resource implications: the preparation of the Local Plan is being prepared using existing Planning Policy Staff and consultants as per the Local Plan budget reported to Cabinet in December 2016

Budget provision: Local Plan Budget

Personnel: Planning Policy Team

Land: N/A

Community Plan/BVPP reference: NA

Relevant statutory powers: NA

Background papers: Cabinet report 9 March 2017

Environmental/Human Rights Act/Crime and Disorder Act Implications: The Draft Local Plan has been subject to an Interim Sustainability Appraisal and further Sustainability Appraisal and Habitats Regulation Assessment will be undertaken prior to the publication of the Regulation 19 Plan.

Key Decision reference: (if required)

Due Regard Record

This page shows **which groups of people are affected** by the subject of this report. It sets out **how they are affected** and how any **discrimination** they experience can be eliminated. It also includes information about how **access to the service(s)** subject to this report can be improved for the different groups of people; and how they can be assisted to **understand each other better** as a result of the subject of this report.

S149 Equality Act 2010 requires that due regard must be paid to this information when considering the subject of this report.

There are no Equality Impact issues arising from this update on the preparation of the Local Plan. The Local Plan itself will be subject to a full Equality Impact Assessment in due course.

Epping Forest District Council Local Plan Developer Forum

Terms of Reference

1. Context:

1.1. The Epping Forest District Draft Local Plan identifies four Strategic Allocations around Harlow, and a number of smaller allocations on sites dispersed across the District in order to meet the development needs of the District up until 2033. Draft Policies SP 2 (Spatial Development Strategy 2011-2033), SP 3 (Strategic Allocations around Harlow) and Policies P 1 – P 12 within Chapter 5 of the Plan identify the allocations. In addition, Draft Policy SP 4 (Place Shaping) provides place shaping principles that future proposals for development within the allocations must adhere to. Appendix A provides further details of the policy context.

2. Scope and Purpose:

2.1. A Developer Forum is being established alongside the progression of the Local Plan, to provide a basis for ongoing discussions with relevant landowners, site promoters and stakeholders. The Developer Forum will provide a basis for the long term planning and implementation of sites identified for allocation.

2.2. It is vitally important that the Council liaises closely on an ongoing basis with relevant landowners and promoters of the sites proposed for allocation within the Draft Plan, and with other stakeholders as required, in order to:

2.2.1. Demonstrate that the Local Plan is 'effective' and that the allocations in the Local Plan will be deliverable and developable, and therefore meet the 'tests of soundness' at Examination-in-Public; and

2.2.2. Ensure that a joined up and 'frontloaded' approach is taken to the masterplanning, design, phasing and delivery of development of sites proposed for allocation and all necessary and associated infrastructure is accommodated within the phasing and infrastructure inputs to the masterplanning, including promoting joint working for sites in multiple ownership, or adjacent allocations.

2.3. The EFDC Local Plan Developer Forum will:

2.3.1. Disseminate progress with the Local Plan and provide a forum for discussion on the implications for sites proposed for allocation;

2.3.2. Provide a basis to produce and agree Statements of Common Ground and / or Memoranda of Understanding to help demonstrate the deliverability of the Local Plan at Examination-in-Public;

- 2.3.3. Promote the adoption and implementation of the Place Shaping principles outlined in Draft Policy SP 4, and other policy requirements of the Plan, by all site promoters;
 - 2.3.4. Provide an overview of progress and programming of Strategic Masterplans;
 - 2.3.5. Provide a basis for the consideration and consistent implementation of corporate approaches to EFDC responsibilities in relation to future development aligned with the Draft Local Plan. For example, this could include confirmation of future arrangements for the management, maintenance and adoption of open spaces and Sustainable Urban Drainage Systems, or EFDC approaches to the delivery of affordable housing and working with Registered Social Landlords.
 - 2.3.6. Ensure that EFDC resources are utilised effectively;
 - 2.3.7. Provide a basis for the consideration and consistent implementation of utilities and statutory providers' approaches. For example, this could include confirmation regarding the education provision, and masterplanning considerations in conjunction with the Local Education Authority and the Education Funding Agency, or NHS/CCG/Health & Wellbeing Board requirement for facilities and/or revenue funding;
 - 2.3.8. Provide a forum for the incorporation of community and stakeholder views, aspirations and input as appropriate;
 - 2.3.9. Further inform the production of the Viability Study and Infrastructure Delivery Plan as required; and
 - 2.3.10. Inform the Local Plan housing delivery trajectory, and help the Council to ensure an adequate supply of housing land at all phases of the Local Plan period.
- 2.4. The Forum does not provide an additional way of making comments on the merits of the Draft Plan itself. Rather the Forum provides part of EFDC's project management arrangements for preparing, and ultimately implementing, the Local Plan.
- 2.5. The Developer Forum does not preclude discussions in relation to individual sites with the Council or other relevant organisations, but rather provides a basis for the coordination and management of Strategic Masterplans and planning proposals associated with sites proposed for allocation within the Local Plan. The Council will seek to agree Planning Performance Agreements to provide a basis for the consideration of planning applications on sites where possible.

3. EFDC Local Plan Developer Forum Structure:

- 3.1. The Developer Forum will include two separate but interrelated elements:

1. EFDC Local Plan Developer Forum – Strategic Sites around Harlow

- This will provide a forum to discuss the progress of the Local Plan in relation to the Strategic Sites around Harlow associated with Draft Policy SP 3.

2. EFDC Local Plan Developer Forum – Other Sites

- This will provide a forum to discuss the progress of the Local Plan in relation to sites identified for allocation through Draft Policy P 1 – P 12.

3.2. It is anticipated that the Developer Forum will evolve over time, and that sub-groups will be established and progressed in due course to consider specific areas, themes or topics as required.

4. Membership:

1. EFDC Local Plan Developer Forum – Strategic Sites around Harlow

4.1. Core membership (to be invited to all meetings):

- 4.1.1. Promoters / landowners / planning agents of strategic sites around Harlow identified within Draft Policy SP 3 of the Draft Local Plan
- 4.1.2. EFDC Officers – including Planning Policy, Development Management, Conservation, Housing, Environmental Health and others as required
- 4.1.3. Essex County Council Officers – including Planning, Transport, Education and others as required
- 4.1.4. Harlow District Council Officers
- 4.1.5. East Herts District Council Officers

4.2. Other members, to be invited to attend as appropriate and required:

- 4.2.1. Infrastructure providers and other statutory agencies
- 4.2.2. Relevant EFDC Councillors
- 4.2.3. Relevant Parish and Town Councils
- 4.2.4. Relevant Community Groups and Organisations
- 4.2.5. ATLAS representative – HCA Advisory Team for Large Applications

2. EFDC Local Plan Developer Forum – Other Sites

4.3. Core membership (to be invited to all meetings):

- 4.3.1. Promoters / landowners / planning agents of sites identified within Draft Policies P 1 – P 12 of the Draft Local Plan
- 4.3.2. EFDC Officers – including Planning Policy, Development Management, Conservation, Housing, Environmental Health and others as required
- 4.3.3. Essex County Council Officers – including Planning, Transport, Education and others as required

4.4. Other members, to be invited to attend as appropriate and required:

- 4.4.1. Infrastructure providers and other statutory agencies

- 4.4.2. Relevant EFDC Councillors
- 4.4.3. Relevant Parish and Town Councils
- 4.4.4. Relevant Community Groups and Organisations

5. Meeting arrangements:

- 5.1. The meetings will be chaired by the EFDC Planning Policy Manager.
- 5.2. Meeting attendance will be by invitation, and will vary depending upon the agenda and scope of discussion.
- 5.3. Meetings will be held at EFDC offices.
- 5.4. EFDC will provide the secretariat for the meetings, preparing draft and final agenda, arranging room bookings, and issuing draft and final minutes.
- 5.5. Draft agendas will be issued 10 working days before the next meeting, and all attendees will be invited to comment.
- 5.6. Final agendas will be circulated at least 5 working days in advance of the proposed meetings.
- 5.7. Meetings will be held at least quarterly, and will be expected to last no more than 2 hours. Subsequent meetings may be arranged, as necessary.
- 5.8. Notes of meetings will be cover key discussions and actions arising, and points will not be attributed to individuals. Notes will be circulated to attendees of the Developer Forum only, with summary reports to EFDC Management Board, the Local Plan Officer Working Group and Neighbourhoods Select Committee. Any requests for full disclosure of notes under Freedom of Information or other relevant legislation will be considered against the requirements in place at the time. No financial or commercially sensitive information will be disclosed.
- 5.9. Thematic or topic meetings will be arranged, as necessary on a 'task-and-finish' basis, as instructed by the Local Plan Developer Forum.

Appendix A

Epping Forest District Draft Local Plan (October 2016) EXTRACTS

Draft Policy SP 3 (Strategic Allocations around Harlow) states that:

E In order to front-load the planning process and ensure that a comprehensive, joined up and cohesive approach is taken to the planning and delivery of high quality development and associated infrastructure, development proposals in relation to sites SP 3.1-3.4 will be required to be in accordance with a Strategic Masterplan which has been adopted by the Council. The Strategic Masterplan(s) will be produced by the applicant, in partnership with the Council and relevant stakeholders (including adjacent land owners, relevant parish / town councils, infrastructure providers and statutory consultees) and where relevant jointly with Harlow District Council. Strategic Masterplans should be prepared in consultation with the local community, and be capable of being adopted by the Council in due course as Supplementary Planning Documents. For sites in close proximity, joint Strategic Masterplans will be required.

F Development proposals for the Strategic Allocations (and where applicable Strategic Masterplans) must reflect and demonstrate that the place shaping principles set out in Policy SP 4 have been adhered to.

Draft Policy SP 4 (Place Shaping) states that:

Development proposals for allocations in the Local Plan (as identified in Policy SP 3 and Chapter 5) and where applicable Strategic Masterplans must reflect and demonstrate that the following place shaping principles will be adhered to:

- i. strong vision, leadership and community engagement;*
- ii. provide for the long-term stewardship of assets;*
- iii. provide mixed-tenure homes and housing types that are genuinely affordable for everyone;*
- iv. ensure a robust range of employment opportunities with a variety of jobs within easy commuting distance of homes;*
- v. provide high quality and imaginatively designed homes with gardens or access to usable and accessible amenity space, combining the very best of town and country living to create healthy homes in vibrant communities;*
- vi. generous, well connected and biodiversity rich green space provision;*
- vii. extend, enhance and reinforce strategic green infrastructure and public open space;*
- viii. ensure that development enhances the natural environment;*
- ix. deliver strong local cultural, recreational, social (including health and educational where required) and shopping facilities in walkable neighbourhoods;*

- x. positive integration and connection with adjacent rural and urban communities including contribution to the revitalisation of existing neighbourhoods;*
- xi. ability to maintain and enhance the important features, character and assets of existing settlements;*
- xii. conserve and positively enhance key landscapes, habitats and biodiversity;*
- xiii. provide for sustainable movement and access to local and strategic destinations (including rail, bus and pedestrians/cycling); and*
- xiv. positively respond to sustainable water management.*

Draft Policies P 1 – P 12 all require that *proposals for residential development will be expected to comply with the place shaping principles identified in Policy SP 4.*

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Report to: Neighbourhoods Select Committee

Date of meeting: 21 March 2017

Portfolio: Leader (Councillor C. Whitbread)

Subject: Corporate Plan Key Action Plan 2016/17 – Quarter 3 progress

Officer contact for further information: Barbara Copson (01992 564042)

Democratic Services Officer: Adrian Hendry (01992 564246)

Recommendations/Decisions Required:

- (1) That the Committee review the third quarter (Q3) progress of the Corporate Plan Key Action Plan for 2016/17 in relation to its areas of responsibility; and
- (2) That the Committee identifies any actions arising from the Corporate Plan Key Action Plan for 2016/17 Q3 within its areas of responsibility, which require in-depth scrutiny or further report on current progress.

Executive Summary:

The Corporate Plan is the Council's key strategic planning document, setting out its priorities over the five-year period from 2015/16 to 2019/20. The priorities or Corporate Aims are supported by Key Objectives, which provide a clear statement of the Council's overall intentions for these five years.

The Key Objectives are delivered by an annual action plan, with each year building upon the progress against the achievement of the Key Objectives for previous years. The annual action plans contain a range of actions designed to achieve specific outcomes and are working documents and are therefore subject to change and development to ensure the actions remain relevant and appropriate, and to identify opportunities to secure further progress or improvement.

The Corporate Plan Key Action Plan for 2016/17 was agreed by the Cabinet in March 2016. Progress in relation to all actions and deliverables is reviewed by the Cabinet, the Overview and Scrutiny Committee, and the appropriate Select Committee, on a quarterly basis.

Reasons for Proposed Decision:

It is important that relevant performance management processes are in place to review progress against the key objectives, to ensure their continued achievability and relevance, and to identify proposals for appropriate corrective action in areas of slippage or under-performance.

Some actions have cross directorate responsibility. Where this is the case the most appropriate Select Committee is requested to consider the action. This report presents progress against the Key Action Plan for 2016/17 for actions most appropriately considered by the Neighbourhoods Select Committee.

Other Options for Action:

Actions with cross directorate responsibility could be considered by an alternative Select Committee, or not considered by the Select Committees.

Report:

1. The Corporate Plan 2015-2020 is the Council's highest level strategic document. It sets the strategic direction for the authority for the five year lifetime of the Plan. It focuses on a number of key areas that the Council needs to focus on during that time and helps to prioritise resources to provide quality services and value for money. These key areas are known as the Corporate Aims and are supported by a set of Key Objectives which represent the Council's high-level initiatives and over-arching goals to achieve the Corporate Aims. The Key Objectives are in turn, delivered via an annual Key Action Plan.
2. The Key Action Plan 2016/17 is populated with actions or deliverables designed to secure progress against each of the Key Objectives during 2016/17. During the subsequent years in the lifetime of the Key Objectives, annual action plans will be developed which build on progress achieved during preceding years.
3. The annual action plans are working documents are subject to change and development to ensure that the actions remain relevant and appropriate, and to identify opportunities to secure further progress or improvement. During quarter 2, action (i) (b) 5) became no longer required. This is because the Cabinet has decided not to pursue this action, and to construct a car park on the land instead.
4. Progress against the Key Action Plan is reviewed on a quarterly basis to ensure the timely identification and implementation of appropriate further initiatives or corrective action where necessary. Quarter 3 progress against the individual actions of the 2016/17 Key Action Plan, is as below and a schedule detailing outturn progress against the forty-nine (49) individual actions of the 2016/17 Key Action plan, is attached as Appendix 1 to this report. In reporting progress, the following 'status' indicators have been applied to the to individual actions:

Achieved (Green) - specific deliverables or actions have been completed or achieved in accordance with in-year targets;

On-Target (Green) - specific deliverables or actions will be completed or achieved in accordance with in-year targets;

Under Control (Amber) - specific deliverables or actions have not been completed or achieved in accordance with in-year targets, but completion/achievement will be secured by a revised target date (specified) or by year-end;

Behind Schedule (Red) - specific deliverables or actions have not been completed or achieved in accordance with in-year targets and completion/achievement may not be secured by year-end; and

Pending (Grey) - specific deliverables or actions cannot currently be fully completed or achieved, as they rely on the prior completion of other actions or are dependent on external factors outside the Council's control.

5. There are 49 actions **in total** for which progress updates for Q3 are as follows:

• Achieved or On-Target:	26 (53%)
• Under Control:	13 (27%)
• Behind Schedule:	4 (8%)
• Pending:	6 (12%)
Total	49 (100%)

12 actions fall within the areas of responsibility of the Neighbourhoods Select Committee. At the end of Q3:

- 6 (50%) of these actions have been 'Achieved' or are 'On-Target'
- 4 (33%) of these actions are 'Under Control'
- 2 (17%) of these actions are 'Behind Schedule'
- 0 (0%) of these actions are 'Pending'

6. The Committee is requested to review the Q3 progress against Key Action Plan for 2016/17 as set out in Appendix 1 of this report, and identify any actions that require more in-depth scrutiny or further progress reports.

7. This report was also considered by the Cabinet on 9 March 2017 and the Overview and Scrutiny Committee on 28 February 2017.

Resource Implications: None for this report.

Legal and Governance Implications: None for this report. Performance monitoring contributes to the delivery of value for money.

Safer, Cleaner, Greener Implications: None for this report.

Consultation Undertaken: The performance information set out in this report has been submitted by each responsible service director.

Background Papers: Relevant documentation is held by responsible service directors.

Impact Assessments:

Risk Management: None for this report.

Equality: None for this report.

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Aim (i) To ensure that the Council has appropriate resources, on an ongoing basis, to fund its statutory duties and appropriate discretionary services whilst continuing to keep Council Tax low.

Key Objective (i)(b) To continue to review and develop the Council’s own assets and landholdings for appropriate uses, in order to maximise revenue streams and capital receipts, and to deliver the following key projects:

- The Epping Forest Shopping Park, Loughton
- Council Housebuilding Programme
- St John’s Redevelopment Scheme, Epping
- North Weald Airfield

Action	Lead Directorates	Target Date	Status	Progress
4) To facilitate, by the purchase of Essex County Council's interest and subsequent disposal to the preferred developer, the St John's Road redevelopment scheme.	Neighbourhoods	31-Oct-16	Under control	<p>(Q1 2016/17) - The final terms of the purchase of the County Council's interest and subsequent disposal to Frontier Estates have been agreed and are to be considered by the respective Cabinet Committees in July 2016. The agreement will be in principle subject to further confirmation from the Secretary of State with regard to State Aid Regulations.</p> <p>(Q2 2016/17) - Following the receipt of the State Aid consent from the Secretary of State, the final drafting of the Legal Documentation for the District Council's purchase and subsequent sale to Frontier Estates at Essex County Council's interest in the site is nearing conclusion. Hope to practically complete by the end of October.</p> <p>(Q3 2016/17) The purchase of Essex County Council's interest in the St John's Road development site was completed in mid-December 2016. Arrangements have been made to continue with site security during the period of the development of the Planning Application by the preferred partner Frontier Estates.</p>
6) Evaluate the submissions received for North Weald Airfield marketing exercise	Neighbourhoods	30-Nov-16	Behind Schedule	<p>(Q1 2016/17) - Submissions received in response to the expressions of interest have been assessed by the Asset Management Cabinet Committee. Specification for procurement of an operational partner under OEJU regulations has commenced.</p>

7) Progress the Epping Forest Shopping Park Scheme Neighbourhoods 31-Oct-16



Under control

(Q2 2016/17) - Changes in European Procurement Legislation have meant that the original intention of a concessionary contract can no longer be pursued, and an OEJU "Competitive Dialogue" procedure is planned to commence in early 2017, once the officer capacity is realised by the final award of the Leisure Management Contract in December 2016.

(Q3 2016/17) as per Q2.

(Q1 2016/17) - Tenders have been received for the construction of the main Shopping Park, which further to final evaluation, will be recommended for approval at the Council's July Cabinet. Delays have been experienced with reaching agreement with Essex County Council on the final specifications and working methodology for the Highways Works. Whilst marketing is proceeding well, the Shopping Park is now not likely to open until Summer 2017.

(Q2 2016/17) - The main construction contractor McLaughlin and Harvey took possession of the site in mid-September. Good mobilisation and clearance works have been achieved. 41 week construction programme on target. Highways Contractor has commenced S278 works. Some delays in relation to the need to locate new attenuation tanks. Shopping Park still on target to open in August 2017.

(Q3 2016/2017) Main contractor ahead of programme, with steelwork erected before Christmas and work commenced on cladding. Main car park base coated and work on retaining wall to the rear of service yard largely complete. Delays still being experienced on S278 works. Ongoing dialogue with ECC to address.

Key Objective (i)(c) To explore appropriate opportunities to make savings and increase income through the shared delivery of services with other organisations, where such arrangements would provide improved and/or more cost effective outcomes.

Action	Lead Directorates	Target Date	Status	Progress
2) Include a clause as standard in new commercial leases, to require the use of Neighbourhoods the Building Control service		30-Apr-16	Achieved	(Q1 2016/17) - Clause being prepared for inclusion in new commercial leases.
				(Q2 2016/2017) - Clause completed. Evidence of commissions being achieved.
				(Q3 2016/2017) As above Q2.
4) Include as standard in the specification for new contracts to upgrade Council facilities, a requirement to use the in-house Building Control service.	Neighbourhoods Resources	30-Apr-16	Under control	(Q1 2016/17) - The contract for the construction of the new Leisure Centre at Waltham Abbey and any other refurbishments will reflect the requirement to use the in-house Building Control Service.
				(Q2 2016/17) - As (i)(c) previous.
				(Q3 2016/2017) As above in Q2.
5) For major development projects in which the Council has a sole or significant interest, ensure building regulations work is carried out by the in-house team	Neighbourhoods	30-Apr-16	Achieved	(Q1 2016/17) - Opportunities are being offered to undertake the work.
				(Q2 2016/17) - The in-house building control team are undertaking the work in relation to the Epping Forest Shopping Park and will be recommended for the potential new Leisure Centre in Waltham Abbey.
				Q3 (12016/2017) As above in Q2.


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Aim (ii) To ensure that the Council has a sound and approved Local Plan and commences its subsequent delivery

BC for NSC on 8 March 2017



Key Objective (ii)(a) To produce a sound Local Plan, following consultation with local residents and working with neighbouring councils, that meets the needs of our communities whilst minimising the impact on the District’s Green Belt.

Action	Lead Directorates	Target Date	Status	Progress
2) To undertake Phase II of a comprehensive Green Belt Review as a key component of the local Plan evidence base.	Neighbourhoods	31-Jan-16	Achieved	<p>(Q1 2016/17) - Phase II of the Green Belt Review has been completed and now forms part of the evidence base in undertaking individual site assessment work.</p> <p>(Q2 2016/17) - Draft Plan agreed for consultation to include Green Belt Assessment.</p> <p>(Q3 2016/17) As above fully achieved.</p> <p>(Note: this action was carried over from last year’s plan and completed this year).</p>
3) Agree a Draft Local Plan and undertake the appropriate sustainability appraisal.	Neighbourhoods	31-May-16	Under Control	<p>(Q1 2016/17) - New Local Plan Development Scheme due to consideration at the July Cabinet Committee. Sustainability appraisals underway.</p> <p>(Q2 2016/17) - Cabinet to consider draft Plan in October. Consultation period to run from the 31 October to the 12 December 2016. LDS timeframes still being achieved.</p> <p>(Q3 2016/17) Consultation successfully completed. Approximately 3500 responses received. Evaluation commenced with report on headline findings to be considered by Cabinet in March. Further work on additional site assessment commissioned.</p>
4) Undertake all necessary consultations and negotiations under the Duty to Co-operate with Neighbouring Authorities	Neighbourhoods	31-Mar-17	On Target	<p>(Q1 2016/17) - The work of the Co-operation for Sustainable Development Board is ongoing fulfilling the requirements of the Duty to Co-operation. Currently chaired by EFDC but due to transfer to East Herts in June. Intention is for the four authorities within the Strategic Housing Market Area to consult simultaneously in the Autumn.</p> <p>(Q2 2016/2017) - Work of the Duty to Co-operate Board ongoing. Two</p>

<p>5) Submit the Final Local Plan to the Planning Inspectorate for Examination.</p>	<p>Neighbourhoods</p>	<p>31-Mar-17</p>	 <p>Behind Schedule</p>	<p>of three Memorandum of Understandings nearing signature. Uttlesford and Harlow consultation timescales have slipped by 2-3 months.</p> <p>(Q3 2016/2017) Uttlesford and Harlow failed to meet consultation deadline. Joint Garden Bid successful with £500,000 awarded by DCLG.</p> <p>(Q1 2016/17) - Final Local Plan Document in accordance with the revised Local Development Scheme due to be submitted for Examination in Public in November/December 2017.</p> <p>(Q2 2016/2017) - As above.</p> <p>(Q3 2016/2017) Cabinet and Council agreed consultation plan in October. Local Development Scheme due to be reviewed in July 2017. Series of Member Workshops planned to consider Regulation 19 Draft in next 6 months. Publication of pre-submission draft in October 2017.</p>
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Key Objective (ii)(c) To deliver the Council’s new Leisure and Cultural Strategy, in order to maximise participation and value for money in the provision of leisure and cultural services to local residents and visitors.

Action	Lead Directorates	Target Date	Status	Progress
<p>3) Jointly pursue the provision of a new Secondary School on the Ongar Campus site</p>	<p>Neighbourhoods</p>	<p>30-Apr-16</p>	 <p>Achieved</p>	<p>(Q1 2016/17) - Completed. (Q2 2016/17) - As above.</p>
<p>4) As part of the competitive dialogue procurement process for the new Leisure Management Contract, take forward the provision of a replacement</p>	<p>Neighbourhoods</p>	<p>30-Sep-16</p>	 <p>Achieved</p>	<p>(Q3 2016/2017) As above. (Q1 2016/17) - Completed. (Q2 2016/17) As above.</p>

BC for NSC on 8 March 2017

swimming pool in Waltham Abbey



(Q3 2016/2017) Places for People appointed as successful contractor and scheme agreed to build new Leisure Centre at Hillhouse.



Report to: Neighbourhoods Select Committee

Date of meeting: 21 March 2017

Portfolio: Environment (Cllr Will Breare-Hall)

Subject: Key Performance Indicators:

- 2016/17 - Quarter 3 performance
- 2017/18 – Review and targets

Officer contact for further information: Barbara Copson (01992 564042)

Democratic Services Officer: Adrian Hendry (01992 564246)

Recommendations/Decisions Required:

- (1) That the select committee reviews Q3 performance in relation to the key performance indicators within its areas of responsibility;**
- (2) That the select committee reviews the proposed key performance indicator set for 2017/18 for those areas which fall within its' areas of responsibility, and provide comment for the Finance and Performance Management Cabinet Committee as appropriate.**

Executive Summary:

The Local Government Act 1999 requires that the Council make arrangements to secure continuous improvement in the way in which its functions and services are exercised, having regard to a combination of economy, efficiency and effectiveness.

As part of the duty to secure continuous improvement, a range of Key Performance Indicators (KPI) relevant to the Council's services and key objectives, are adopted each year by the Finance and Performance Management Cabinet Committee. Performance against the KPIs is monitored on a quarterly basis by Management Board and overview and scrutiny to drive improvement in performance and ensure corrective action is taken where necessary.

Reasons for Proposed Decision:

The KPIs provide an opportunity for the Council to focus attention on how specific areas for improvement will be addressed, and how opportunities will be exploited and better outcomes delivered. It is important that relevant performance management processes are in place to review and monitor performance against the key performance indicators to ensure their continued achievability and relevance, and to identify proposals for appropriate corrective action in areas of slippage or under performance.

Other Options for Action:

No other options are appropriate in this respect. Failure to identify performance measures, set targets, monitor and review KPI performance, and consider corrective action where

necessary, could have negative implications for judgements made about the Council's progress, and might mean that opportunities for improvement are lost.

Report:

1. A range of thirty-seven (37) Key Performance Indicators (KPIs) for 2016/17 was adopted by the Finance and Performance Management Cabinet Committee in March 2016. The KPIs are important to the improvement of the Council's services and the achievement of its key objectives, and comprise a combination of some former statutory indicators and locally determined performance measures. The aim of the KPIs is to direct improvement effort towards services and the national priorities and local challenges arising from the social, economic and environmental context of the district, that are the focus of the key objectives.
2. Progress in respect of each of the KPIs is reviewed by the relevant Portfolio Holder, Management Board, and overview and scrutiny at the conclusion of each quarter. This report provides an overview of all KPIs and includes in detail those indicators which fall within the areas of responsibility of the Neighbourhoods Select Committee
3. A headline end of Q3 performance summary in respect of the KPIs falling within the Neighbourhoods Select Committee's areas of responsibility for 2016/17, together with a detailed performance report for each of these indicators, is attached at Appendix 1 to this report. Attached at Appendix 2 is the Improvement plan NEI010 (Increase in homes) (no.); the Improvement Plans for NEI001 (Non-recycled waste) (kg), NEI003 (Litter) (%), NEI012 (Commercial premises let) (%), and NEI013 (Waste recycled) (%) being unavailable.

Key Performance Indicators 2016/17 – Q3 Performance

4. The overall position for **all** thirty-seven (37) KPIs at the end of the Quarter 3, was as follows:
 - (a) 26 (70%) indicators achieved third quarter target;
 - (b) 11 (30%) indicators did not achieve third quarter target, although 4 (11%) of KPIs performed within the agreed tolerance for the indicator; and,
 - (c) 31 (84%) indicators are currently anticipated to achieve the cumulative year-end target, and a further 3 (8%) are uncertain whether they will achieve the cumulative year-end target.
5. **Neighbourhoods Select Committee indicators** – Thirteen (13) of the Key Performance Indicators fall within the Neighbourhoods Select Committee's areas of responsibility. The overall position with regard to the achievement of target performance at Q3 for these 13 indicators, was as follows:
 - (a) 8 (62%) indicators achieved target;
 - (b) 5 (38%) indicators did not achieve target, although 4 (31%) of these KPI's performed within the agreed tolerance for the indicator;
 - (c) 11 (85%) of indicators are currently anticipated to achieve year-end target, whilst 0 indicators are uncertain whether they will achieve year-end target.
6. The 'amber' performance status used in the KPI report identifies indicators that have missed the agreed target for the quarter, but where performance is within an agreed tolerance or range. The KPI tolerances were agreed by Management Board when targets for the KPIs were set in February 2016.

KPI annual review

7. The KPI set is reviewed annually by Management Board to ensure the indicators and their targets are appropriate to provide challenge in the Council's key areas and to meet its objectives.

8. Whilst the recent annual review considered that the current indicator set was appropriate to provide challenge and improvement during 2017/18, a number of changes to targets have been identified for the coming year.

9. The provisional target for each indicator has been identified by service directors and relevant portfolio holder(s), based on third-quarter performance (and the estimated outturn position) for the current year. Management Board will review the provisional targets against outturn data for 2016/17 when this becomes available, and any revisions to next year's targets will be reported to the appropriate select committee in along with first quarter 2017/18 data.

10. The review of the KPIs which fall within the areas of responsibility of the Neighbourhoods Select Committee has resulted in 5 proposed changes to targets, the details of which are set out below and more fully in Appendix 3:

- (a) NEI006 – Fly-tip Investigations – target decreased
- (b) NEI010 – Increase in homes – target increased
- (c) NEI011 – Commercial rent arrears – target increased
- (d) NEI013 – Waste recycled – target decreased
- (e) NEI014 – Waste composted – target increased

11. Improvement plans will be developed for each KPI for 2017/18, identifying actions to achieve target performance, if they fail to reach target at any quarter. The plans will be considered and agreed by Management Board, and submitted to the select committee along with the quarters' performance submission.

12. The Select Committee is requested to review Q3 performance for the KPIs, and consider the proposed KPIs and targets for 2017/18, within its areas of responsibility. This information was also considered by Management Board on 25 January 2017 and will be considered by the Finance and Performance Management Cabinet Committee on 30 March 2017.

Resource Implications: none for this report

Legal and Governance Implications: none for this report; however performance management of key activities is important to the achievement of value for money.

Safer, Cleaner, Greener Implications: none for this report

Consultation Undertaken: Relevant Select Committees and the Finance and Performance Management Cabinet Committee.








































Background Papers: KPI submissions held by the Performance Improvement Unit.

Impact Assessments:

Risk Management: none for this report

Equality: none for this report.

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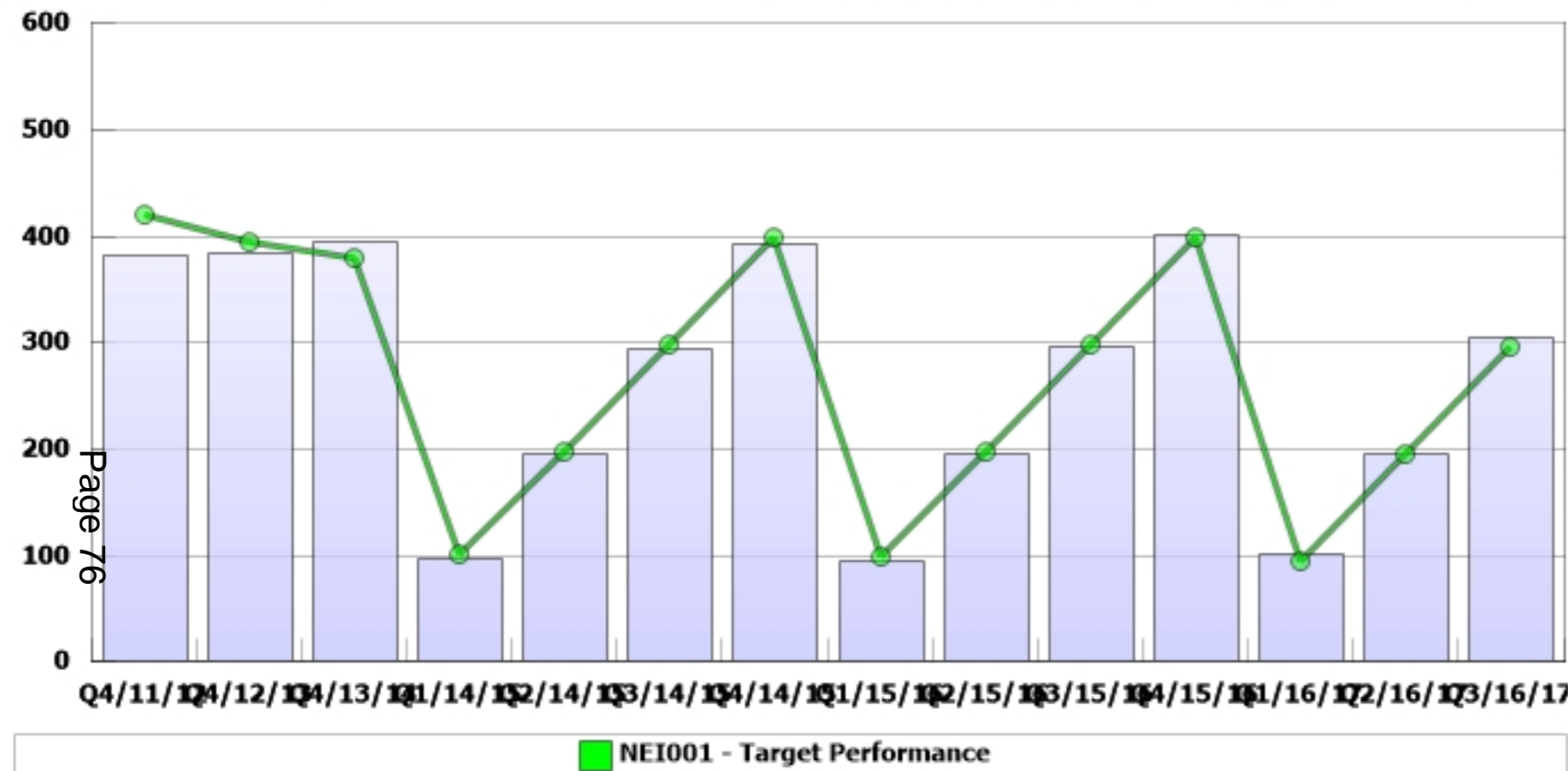
Quarterly Indicators		Quarter 1		Quarter 2		Quarter 3		Quarter 4		Is year-end target likely to be achieved?		
		Tgt	Actual	Tgt	Actual	Tgt	Actual	Tgt	Actual			
Neighbourhoods												
NEI001	(Non-recycled waste) (kg)	95	101		196	195		296	306		400	No
NEI003	(Litter) (%)	8%	8%		8%	8%		8%	9%		8%	Yes
NEI004	(Detritus) (%)	10%	10%		10%	9%		10%	9%		10%	Yes
NEI005	(Neighbourhood issues) (%)	95.50%	98.82%		95.50%	99.16%		95.50%	98.80%		95.50%	Yes
NEI006	(Fly-tip investigations) (%)	92.00%	99.39%		92.00%	99.01%		92.00%	98.63%		92.00%	Yes
NEI007	(Fly-tip: contract) (%)	90.00%	93.72%		90.00%	91.74%		90.00%	91.51%		90.00%	Yes
NEI008	(Fly-tip: non-contract) (%)	90.00%	94.67%		90.00%	95.22%		90.00%	94.24%		90.00%	Yes
NEI009	(Noise investigations) (%)	90.00%	88.76%		90.00%	90.95%		90.00%	92.38%		90.00%	Yes
NEI010	(Increase in homes) (no.)	41	13		69	57		87	85		230	Yes
NEI011	(Commercial rent arrears) (%)	2.5%	2.0%		2.5%	2.0%		2.5%	1.8%		2.5%	Yes
NEI012	(Commercial premises let) (%)	98.00%	98.89%		98.00%	98.15%		98.00%	97.42%		98.00%	Yes
NEI013	(Waste recycled) (%)	30.00%	22.00%		30.00%	26.09%		30.00%	25.00%		30.00%	No
NEI014	Waste composted (%)	30.00%	37.64%		30.00%	35.00%		30.00%	33.15%		30.00%	Yes

NEI001 How much non-recycled waste was collected for every household in the district?

Additional Information: This indicator supports reductions in the amount of residual waste collected, through less overall waste and more reuse, recycling and composting. Quarterly targets and performance details for this indicator are measured in kilograms per household, and represent the cumulative total for the year to date.

For enquiries regarding this indicator contact the Performance Improvement Unit by email on performance@eppingforestdc.gov.uk or by telephone on 01992 564042.

Current and previous quarters performance



Quarter	Target	Actual	Status
Q3/16/17	296	306	X
Q2/16/17	196	195	✓
Q1/16/17	95	101	X
Q4/15/16	400	402	X
Q3/15/16	299	297	✓

Annual Target: 2016/17 - 400kg
2015/16 - 400kg

Indicator of good performance:
A lower waste figure is good

↓ is the direction of improvement

Is it likely that the target will be met at the end of the year?
 No



Comment on current performance (including context):

(Q3 2016/17) - The outturn is outside target but we still need to see if weights are increasing over the year

Corrective action proposed (if required):

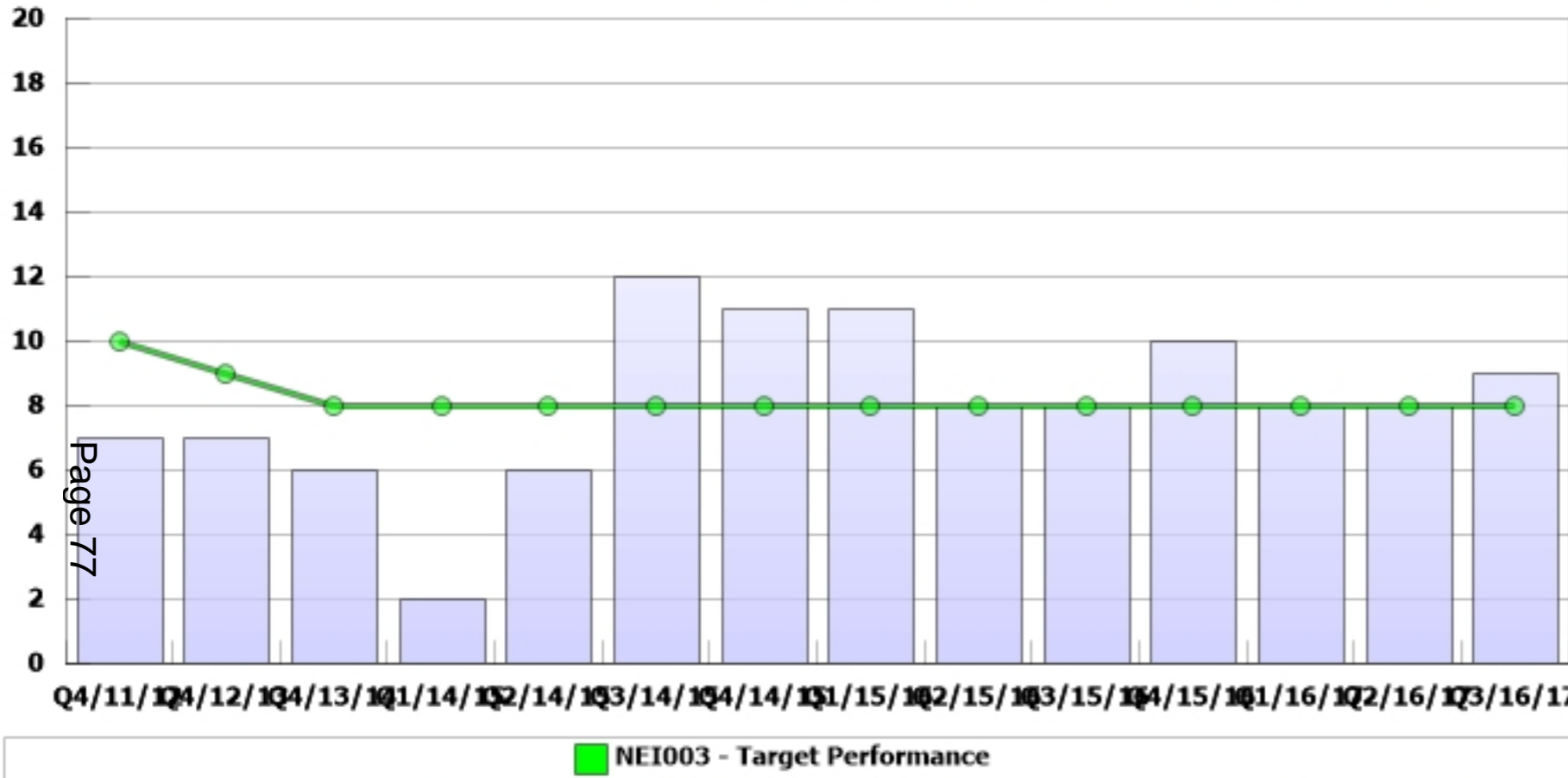
(Q3 2016/17) - Alternate strategies are being discussed to see what effective action can be taken. Levels of recycling in the residual waste are high with different reasons from type of containers and allowances made. We may have to revert to the targets for the quarters as in the previous year.

NEI003 What percentage of our district had unacceptable levels of litter?

Additional Information: This indicator seeks to reduce unacceptable levels of litter. Performance is based on surveys of prescribed sites carried out over four quarterly periods each year, and represents the percentage of relevant land with deposits of litter which exceed the acceptable level.

For enquiries regarding this indicator contact the Performance Improvement Unit by email on performance@eppingforestdc.gov.uk or by telephone on 01992 564042.

Current and previous quarters performance



Quarter	Target	Actual	Status
Q3/16/17	8%	9%	✗
Q2/16/17	8%	8%	✓
Q1/16/17	8%	8%	✓
Q4/15/16	8%	10%	✗
Q3/15/16	8%	8%	✓

Annual 2016/17 - 8%
Target: 2015/16 - 8%

Indicator of good performance:
A lower percentage is good

↓ is the direction of improvement

Is it likely that the target will be met at the end of the year?

Yes

Comment on current performance (including context):

(Q3 2016/17) - Disappointing performance - need to drive down the amount of vehicle thrown litter but this is hard to monitor or deal with.

Corrective action proposed (if required):

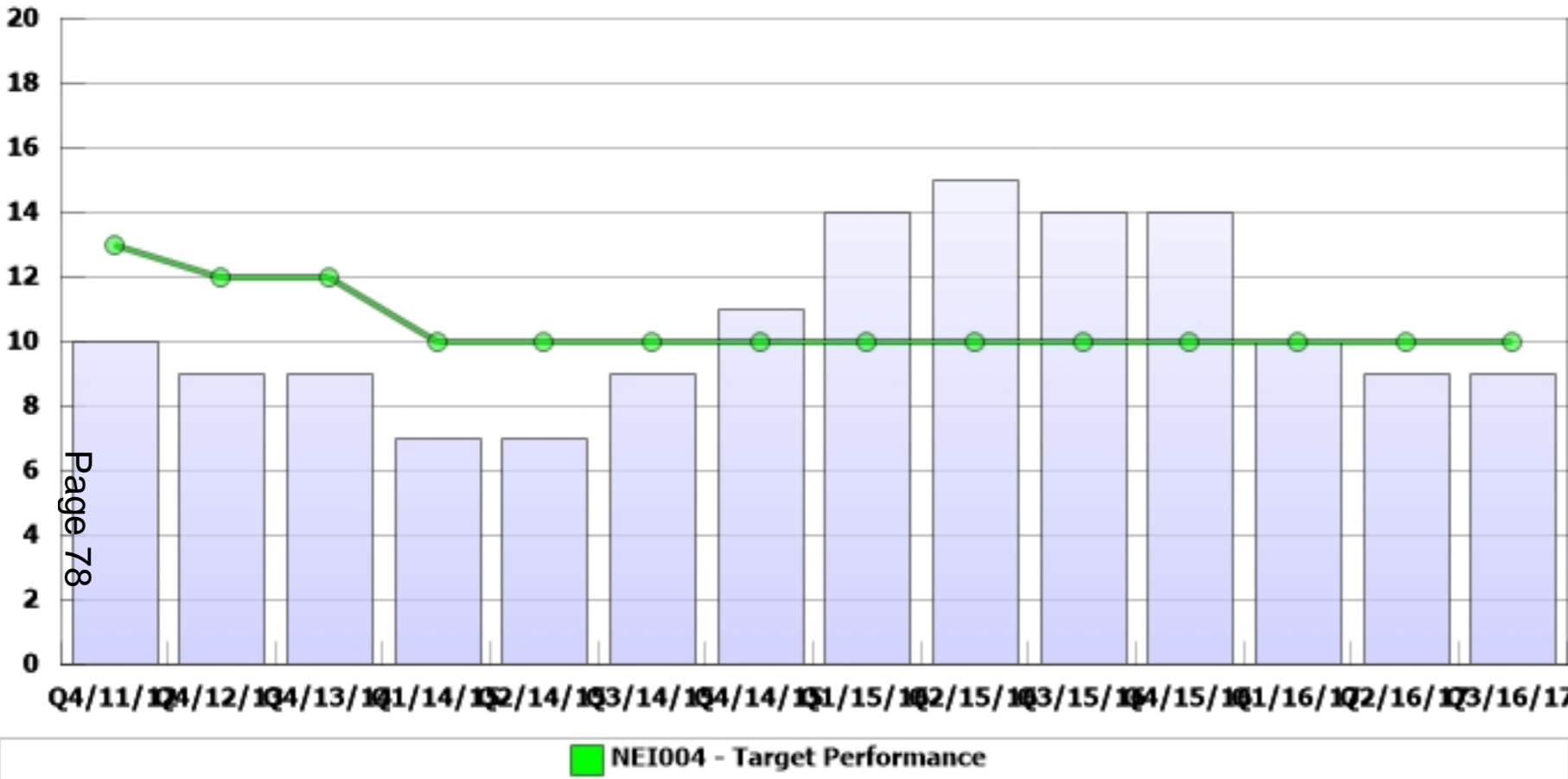
(Q3 2016/17) - increase monitoring of crews by change in working arrangement of biffa staff.

NEI004 What percentage of our district had unacceptable levels of detritus (dust, mud, stones, rotted leaves, glass, plastic etc.)?

Additional Information: This indicator seeks to reduce unacceptable levels of detritus. Performance is based on surveys of prescribed sites carried out over the four quarterly periods each year, and represents the percentage of relevant land with deposits of detritus which exceed the acceptable level.

For enquiries regarding this indicator contact the Performance Improvement Unit by email on performance@eppingforestdc.gov.uk or by telephone on 01992 564042.

Current and previous quarters performance



Quarter	Target	Actual	Status
Q3/16/17	10%	9%	✓
Q2/16/17	10%	9%	✓
Q1/16/17	10%	10%	✓
Q4/15/16	10%	14%	✗
Q3/15/16	10%	14%	✗

Annual Target: 2016/17 - 10%
 Target: 2015/16 - 10%
 Indicator of good performance: A lower percentage is good
 ↓ is the direction of improvement



Is it likely that the target will be met at the end of the year?
 Yes

Comment on current performance (including context):

(Q3 2016/17) - Performance is now becoming more consistent - further joint work is planned to consolidate performance

Corrective action proposed (if required):

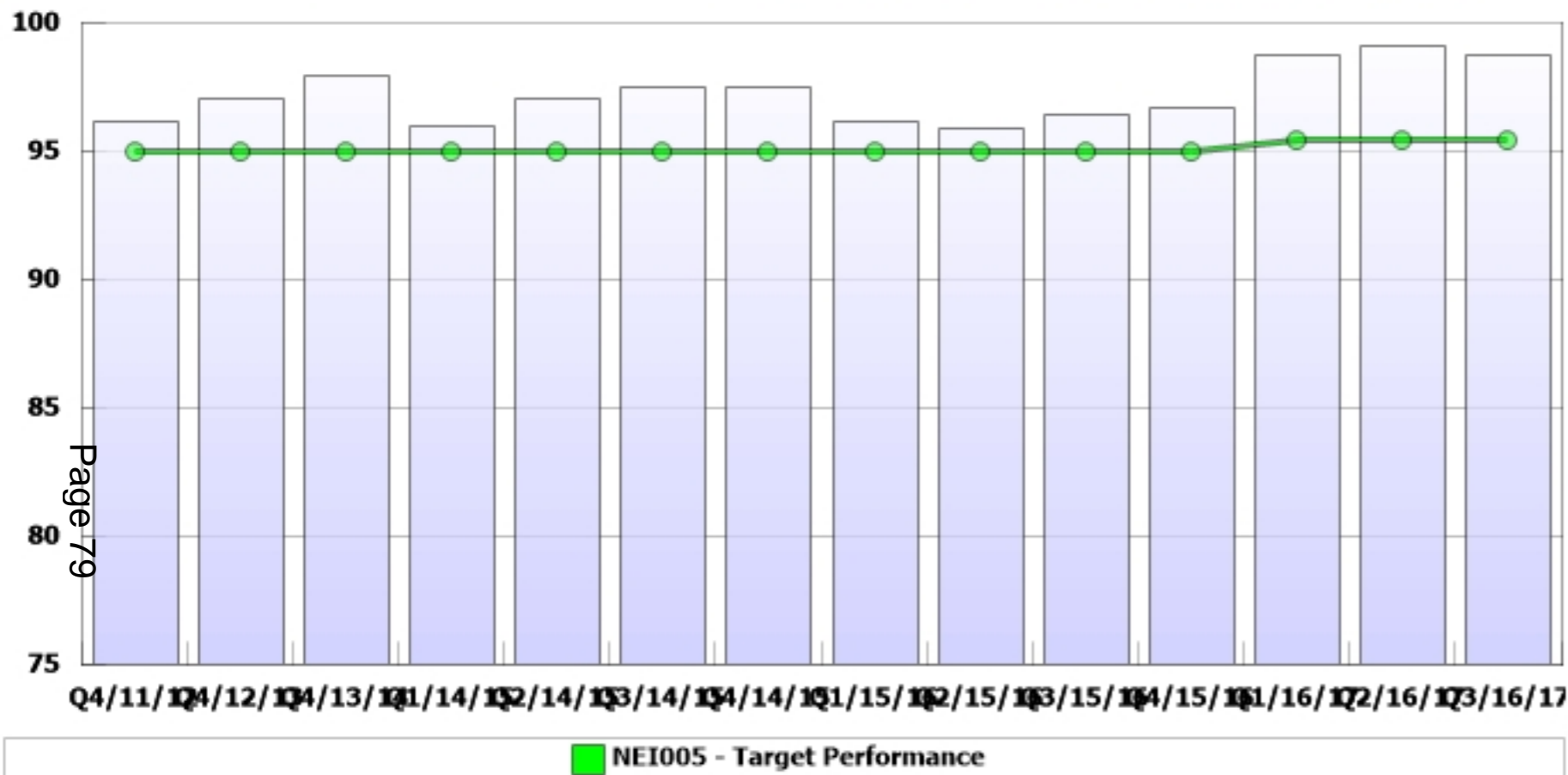
(Q3 2016/17) -

NEI005 What percentage of the issues and complaints received by the Environment & Neighbourhoods Team received an initial response within 3 days?

Additional Information: Dealing with 'enviro-crime' is a key element of the 'Safer, Cleaner, Greener' initiative, and this indicator measures the percentage of issues raised and complaints received by the Environment and Neighbourhoods Team that are responded to within three working days

For enquiries regarding this indicator contact the Performance Improvement Unit by email on performance@eppingforestdc.gov.uk or by telephone on 01992 564042.

Current and previous quarters performance



Quarter	Target	Actual
Q3/16/17	95.50%	98.80%
Q2/16/17	95.50%	99.16%
Q1/16/17	95.50%	98.82%
Q4/15/16	95.00%	96.78%
Q3/15/16	95.00%	96.46%

Annual Target: 2016/17 - 95.50%
2015/16 - 95.00%

Indicator of good performance: A higher percentage is good

↑ is the direction of improvement



Is it likely that the target will be met at the end of the year?

Yes



Comment on current performance (including context):

(Q3 2016/17) Target achieved. 4185 out of 4236 issues and complaints received an initial response within 3 working days

Corrective action proposed (if required):

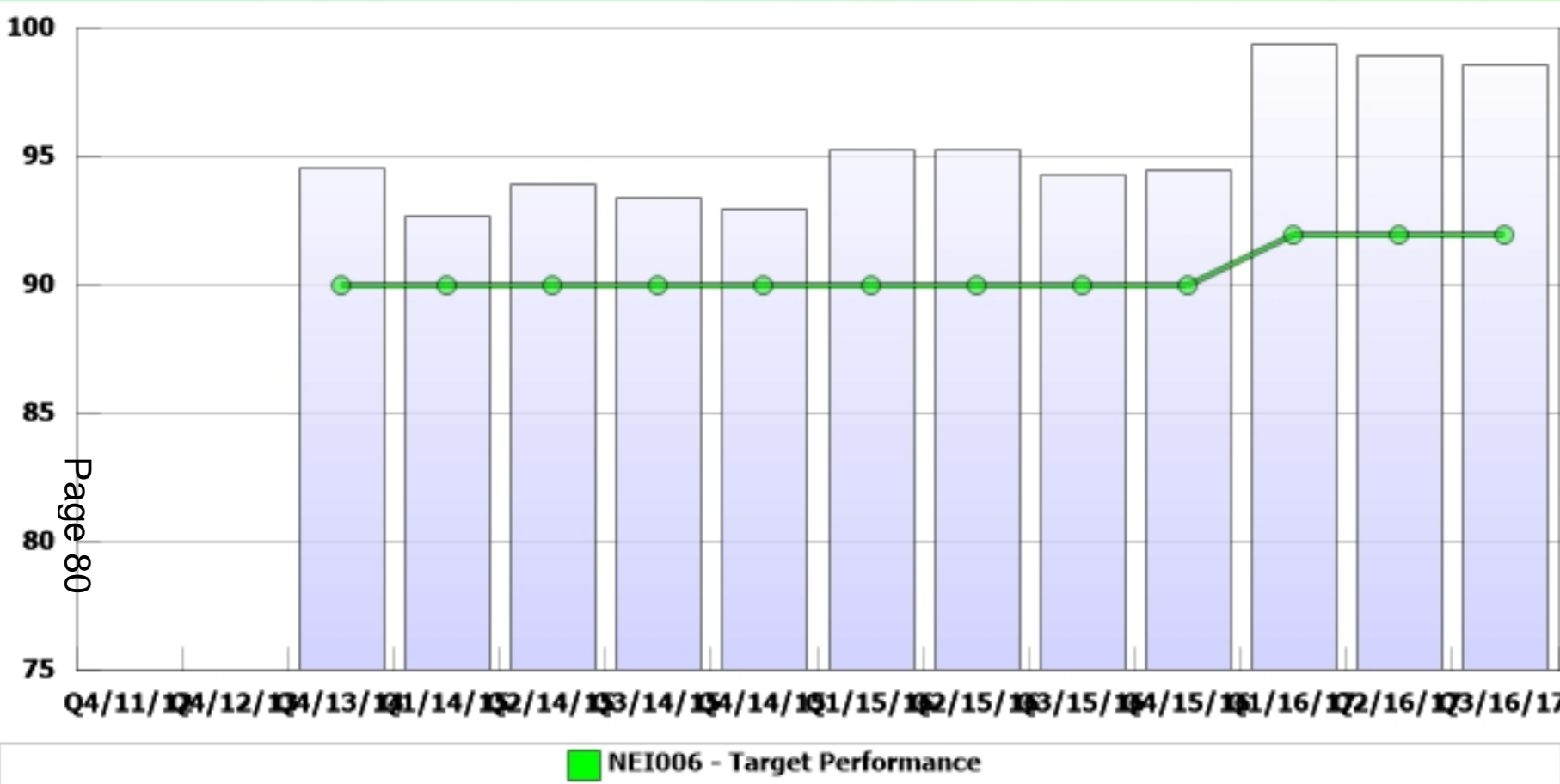
None

NEI006 What percentage of the recorded incidences of fly-tipping are investigated within 3 working days of being recorded?

Additional Information: The Team register all fly-tipping incidents reported or found on public and private land in the district. Incidents that may have evidence that can lead to the source of the waste are investigated, subject to resources and priorities at that time. Clearance is delayed until investigated (unless there are other factors that require the waste to be cleared immediately).

For enquiries regarding this indicator contact the Performance Improvement Unit by email on performance@eppingforestdc.gov.uk or by telephone on 01992 564042.

Current and previous quarters performance



Quarter	Target	Actual
Q3/16/17	92.00%	98.63%
Q2/16/17	92.00%	99.01%
Q1/16/17	92.00%	99.39%
Q4/15/16	90.00%	94.54%
Q3/15/16	90.00%	94.32%

Annual Target: 2016/17 - 92.00%
2015/16 - 90.00%

Indicator of good performance: A higher percentage is good

↑ is the direction of improvement

Is it likely that the target will be met at the end of the year?
 Yes



Comment on current performance (including context):

(Q3 2016/17) Target achieved 432 of 438 incidents of fly-tipping that were investigated in this period were within 3 working days of the fly-tip being recorded.

Corrective action proposed (if required):

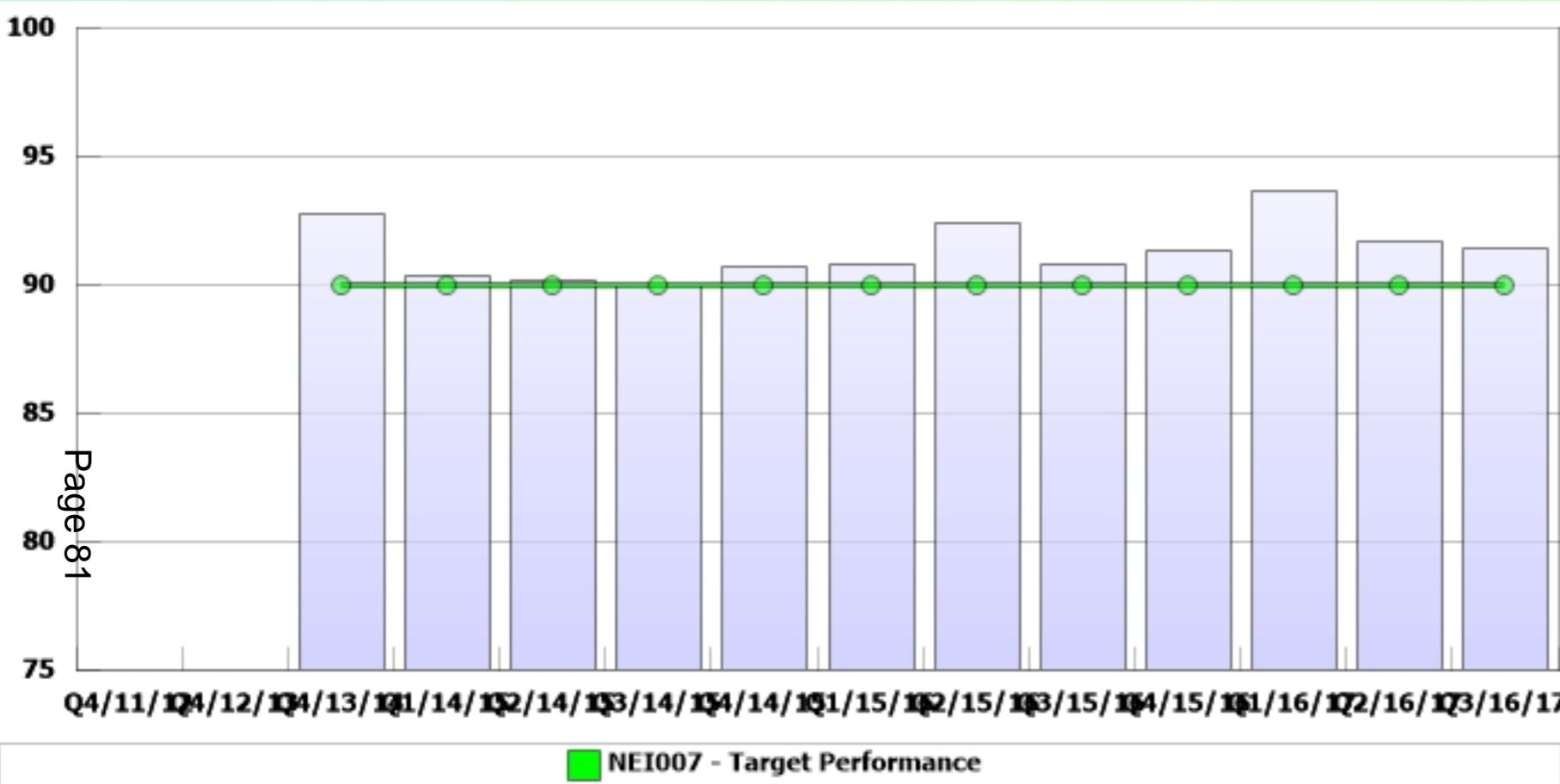
None

NEI007 What percentage of the recorded incidences of fly-tipping (contract cleared) are removed within 5 working days of being recorded?

Additional Information: This indicator specifically considers fly-tip incidents which occur on land which the council is responsible for clearing and which can be cleared under the existing waste contract.

For enquiries regarding this indicator contact the Performance Improvement Unit by email on performance@eppingforestdc.gov.uk or by telephone on 01992 564042.

Current and previous quarters performance



Quarter	Target	Actual
Q3/16/17	90.00%	91.51%
Q2/16/17	90.00%	91.74%
Q1/16/17	90.00%	93.72%
Q4/15/16	90.00%	91.38%
Q3/15/16	90.00%	90.89%

Annual Target: 2016/17 - 90.00%
 Target: 2015/16 - 90.00%

Indicator of good performance:
 A higher percentage is good

↑ is the direction of improvement

Is it likely that the target will be met at the end of the year?
 Yes



Comment on current performance (including context):

(Q3 2016/17) Target achieved. 679 of 742 (91.51%) incidents were cleared under the waste contract within the target of 5 working days.

Corrective action proposed (if required):

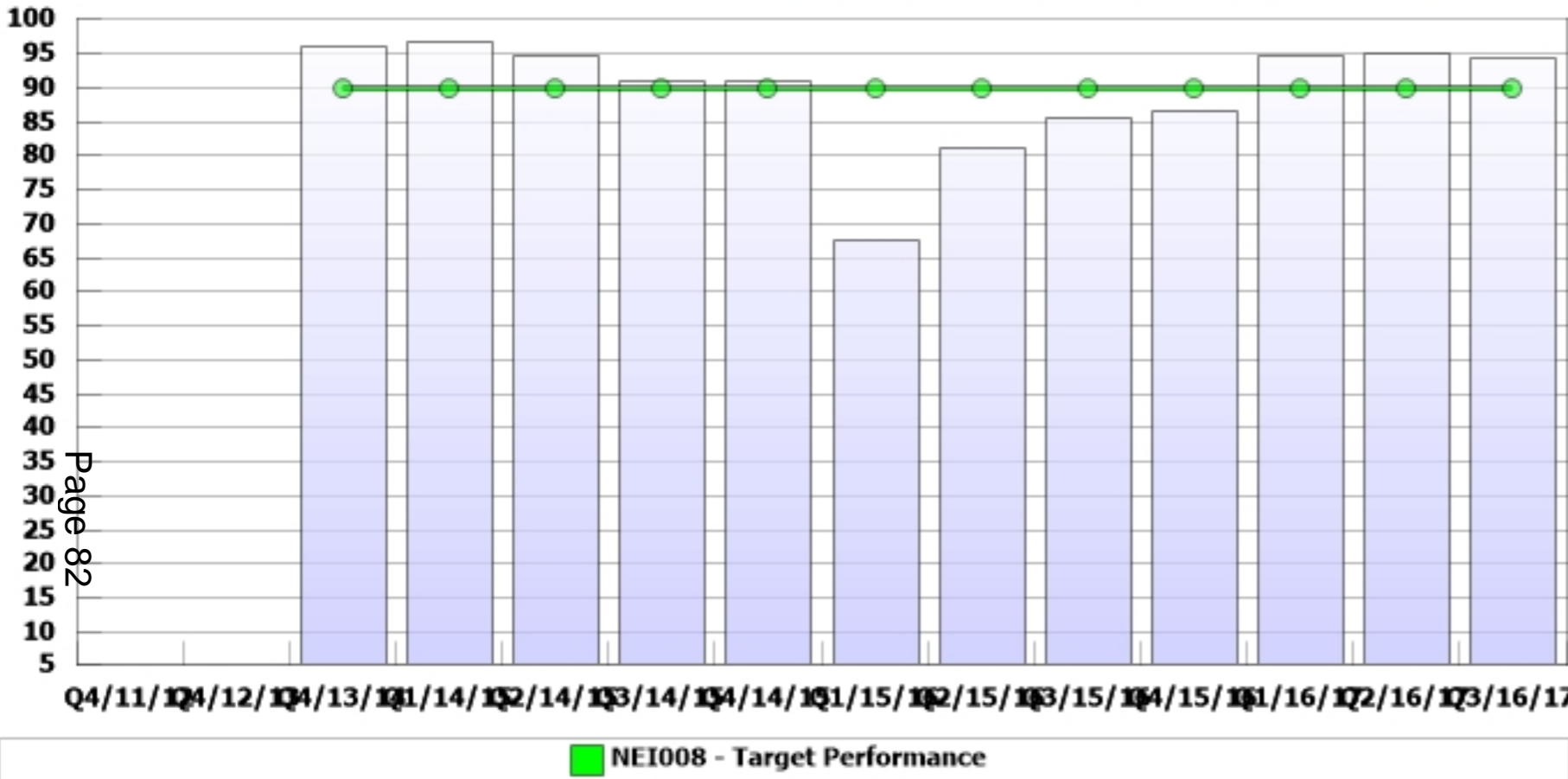
None

NEI008 What percentage of the recorded incidences of fly-tipping (variation order / non-contract) are removed within 10 working days of being recorded?

Additional Information: This indicator specifically considers fly-tip incidents which occur on land which the council is responsible for clearing and which require an additional variation order or other non-contract clearance.

For enquiries regarding this indicator contact the Performance Improvement Unit by email on performance@eppingforestdc.gov.uk or by telephone on 01992 564042.

Current and previous quarters performance



Quarter	Target	Actual	Status
Q3/16/17	90.00%	94.24%	✓
Q2/16/17	90.00%	95.22%	✓
Q1/16/17	90.00%	94.67%	✓
Q4/15/16	90.00%	86.49%	✗
Q3/15/16	90.00%	85.64%	✗

Annual Target: 2016/17 - 90.00%
 Target: 2015/16 - 90.00%

Indicator of good performance:
 A higher percentage is good

↑ is the direction of improvement

Is it likely that the target will be met at the end of the year?
 Yes



Comment on current performance (including context):

(Q3 2016/17) The target has been achieved. 671 incidents were cleared within 10 working days, out of 712 incidents = 94.24%

Corrective action proposed (if required):

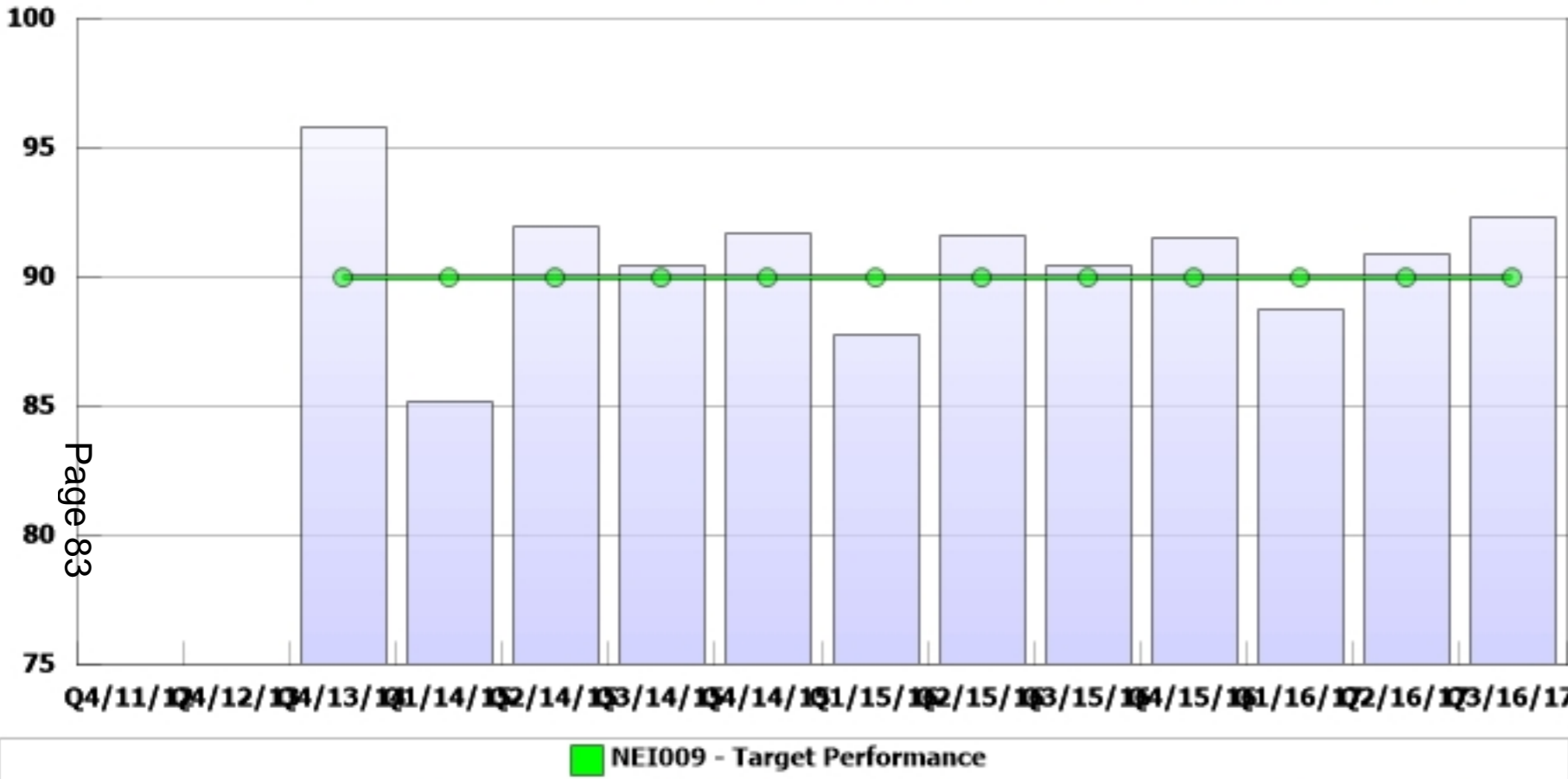
None

NEI009 What percentage of out of hours (OOH) noise complaints are responded to within 15 minutes?

Additional Information: The callout service for noise complaints is 24 hours (restricted emergency service after 00:00 and before 13:00 at the weekend). Calls are recorded by the Council's stand-by officer and passed to the duty noise officer who telephones the complainant. A response has been made when the duty noise officer has telephoned the complainant.

For enquiries regarding this indicator contact the Performance Improvement Unit by email on performance@eppingforestdc.gov.uk or by telephone on 01992 564042.

Current and previous quarters performance



Quarter	Target	Actual	Status
Q3/16/17	90.00%	92.38%	✓
Q2/16/17	90.00%	90.95%	✓
Q1/16/17	90.00%	88.76%	✗
Q4/15/16	90.00%	91.56%	✓
Q3/15/16	90.00%	90.52%	✓

Annual Target: 2016/17 - 90.00%
 Target: 2015/16 - 90.00%
 Indicator of good performance: A higher percentage is good
 ↑ is the direction of improvement

Is it likely that the target will be met at the end of the year?
 Yes

Comment on current performance (including context):

(Q3 2016/17) The target has been achieved.
 279 of 302 calls achieved the target and received a call back within 15 minutes (92.38%).

Corrective action proposed (if required):

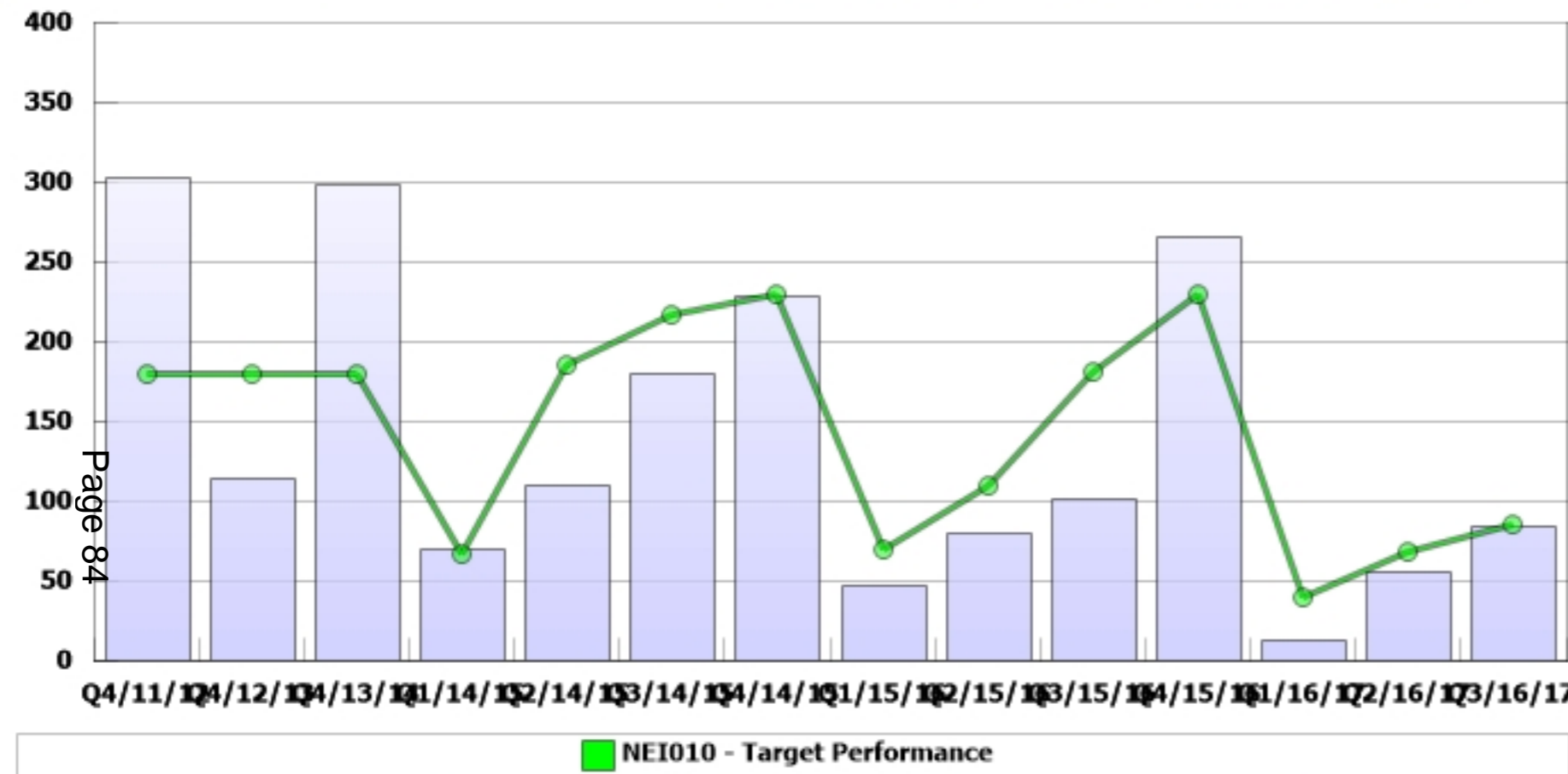
None

NEI010 What was the net increase or decrease in the number of homes in the district?

Additional Information: This indicator encourages a greater supply of new homes to address long-term housing affordability issues, and measures the net increase in dwelling stock over one year. Quarterly targets and performance details for this indicator represent the cumulative total for the year to date.

For enquiries regarding this indicator contact the Performance Improvement Unit by email on performance@eppingforestdc.gov.uk or by telephone on 01992 564042.

Current and previous quarters performance



Quarter	Target	Actual	Status
Q3/16/17	87	85	✗
Q2/16/17	69	57	✗
Q1/16/17	41	13	✗
Q4/15/16	230	267	✓
Q3/15/16	182	102	✗

Annual Target: 2016/17 - 230
2015/16 - 230

Indicator of good performance:
A higher number is good

↑ is the direction of improvement

Is it likely that the target will be met at the end of the year?
 Yes

Comment on current performance (including context):

(Q3-2016/17) - Our Quarter 3 KPI figure is 28, and our quarterly cumulative figure is 85. Our target cumulative figure for the Q3 is 87. It appears that if this rate of housing completions were to continue it would mean that we would fail to meet our Annual Target for 2016/17 housing Completions of 230 additional units.

Corrective action proposed (if required):

(Q3 2016/17) - None proposed at this time.

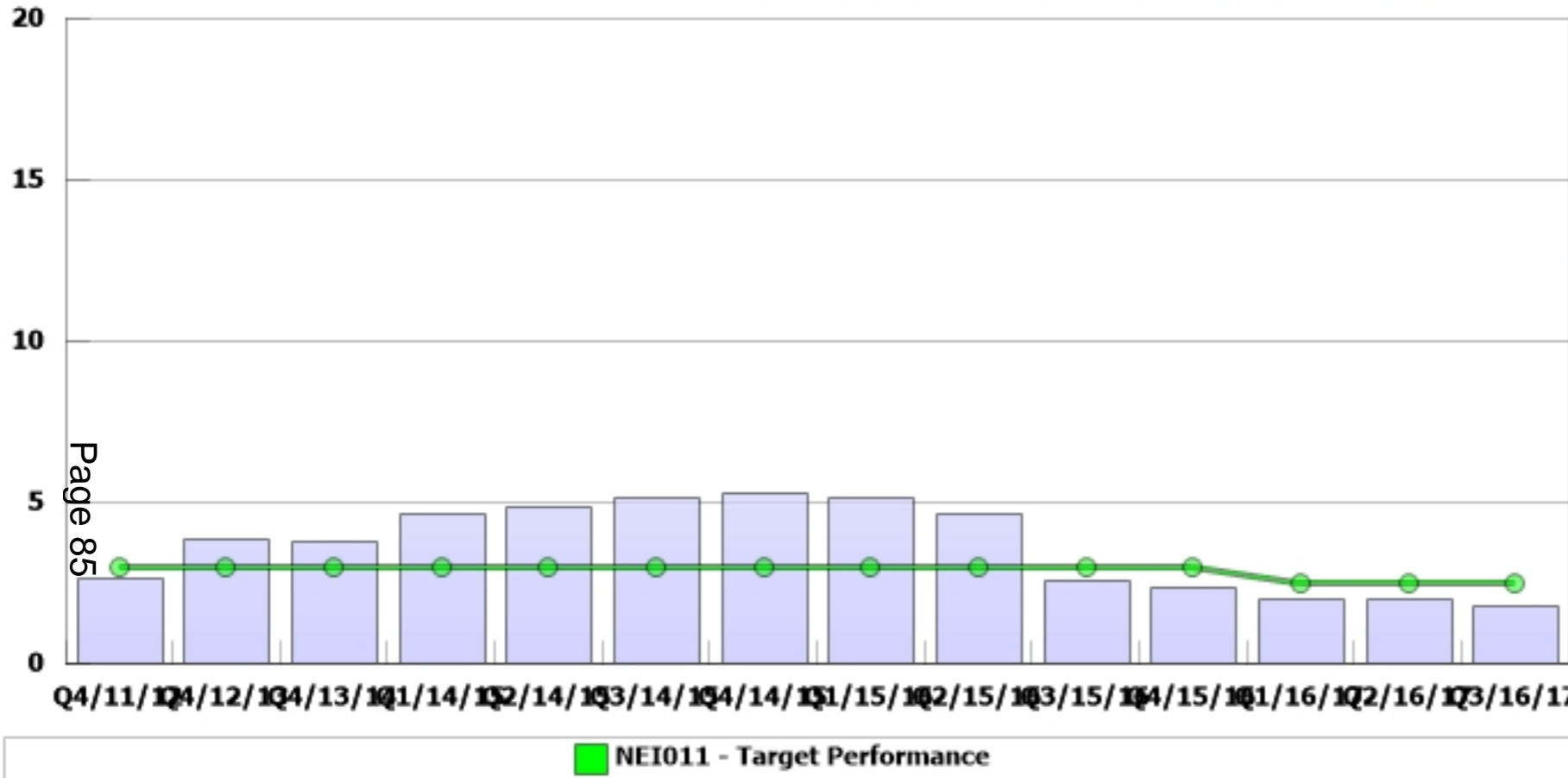
It is important to note that the Council has a limited influence over housing completion figures meeting targets. However, previous data shows that majority of completions take place during the Quarter 4 period. Provision for future housing development made through new housing designations in the Draft Local Plan will further encourage housing completion rates in the future.

NEI011 What percentage of the rent we were due to be paid for our commercial premises was not paid?

Additional Information: This indicator is a measure of a local authority's rent collection and arrears recovery service for its property portfolio and assists in monitoring the collection of important income to the Council. Performance against this indicator is reported on a quarterly basis.

For enquiries regarding this indicator contact the Performance Improvement Unit by email on performance@eppingforestdc.gov.uk or by telephone on 01992 564042.

Current and previous quarters performance



Quarter	Target	Actual	Performance
Q3/16/17	2.5%	1.8%	✓
Q2/16/17	2.5%	2.0%	✓
Q1/16/17	2.5%	2.0%	✓
Q4/15/16	3.0%	2.4%	✓
Q3/15/16	3.0%	2.6%	✓

Annual Target: 2016/17 - 2.5%
2015/16 - 3.0%

Indicator of good performance:
A lower percentage is good

↓ is the direction of improvement

Is it likely that the target will be met at the end of the year?
 Yes



Comment on current performance (including context):

(Q3 2016/17) - target met (good improvement resulting from more proactive arrears management).

Corrective action proposed (if required):

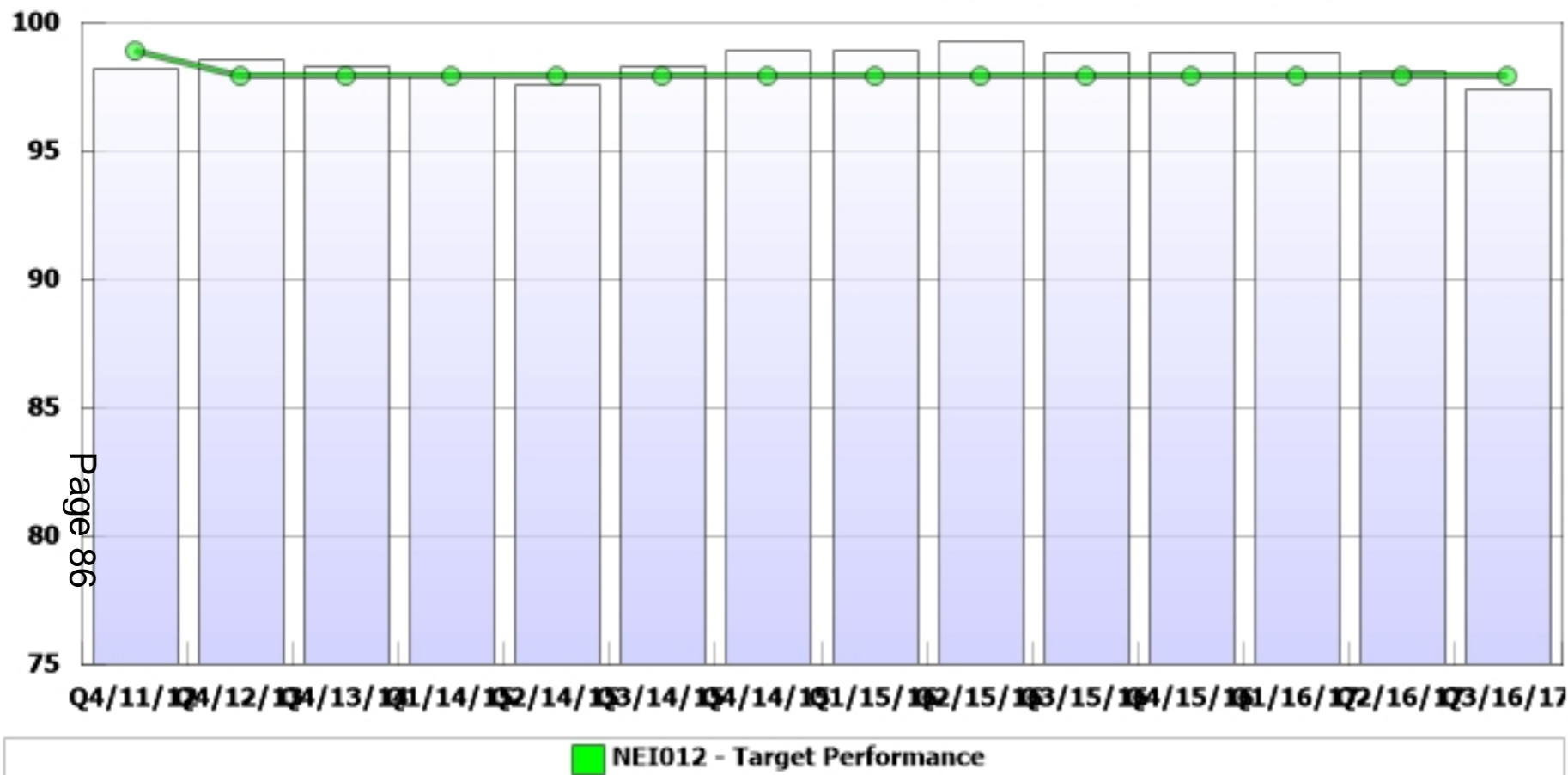
(Q3 2016/17) - continue with pro-active arrears management and timely issuing of invoices and reminders.

NEI012 What percentage of our commercial premises was let to tenants?

Additional Information: This indicator monitors the effectiveness of the local authority's asset management function and helps to monitor the vitality of the Council's commercial and industrial portfolio. Performance against this indicator is reported on a quarterly basis.

For enquiries regarding this indicator contact the Performance Improvement Unit by email on performance@eppingforestdc.gov.uk or by telephone on 01992 564042.

Current and previous quarters performance



Quarter	Target	Actual
Q3/16/17	98.00%	97.42%
Q2/16/17	98.00%	98.15%
Q1/16/17	98.00%	98.89%
Q4/15/16	98.00%	98.89%
Q3/15/16	98.00%	98.89%



Annual Target: 2016/17 - 98.00%
 2015/16 - 98.00%

Indicator of good performance:
 A higher percentage is good

↑ is the direction of improvement

Is it likely that the target will be met at the end of the year?
 Yes



Comment on current performance (including context):

(Q3 2016/17) - Performance slightly below target for this quarter. Mainly due to delay in completion of letting vacant units at The Broadway, Loughton as have required changes in planning use.
 12 & 14 The Broadway, Debden, Loughton: Post office lease formally ended on 10 Dec 2015 therefore property now vacant.
 21 The Broadway vacant (however terms agreed to let). This was called in to Planning Committee and subject of formal process for objections.
 42 The Broadway, Debden, Loughton: now fully let since last quarter

Corrective action proposed (if required):

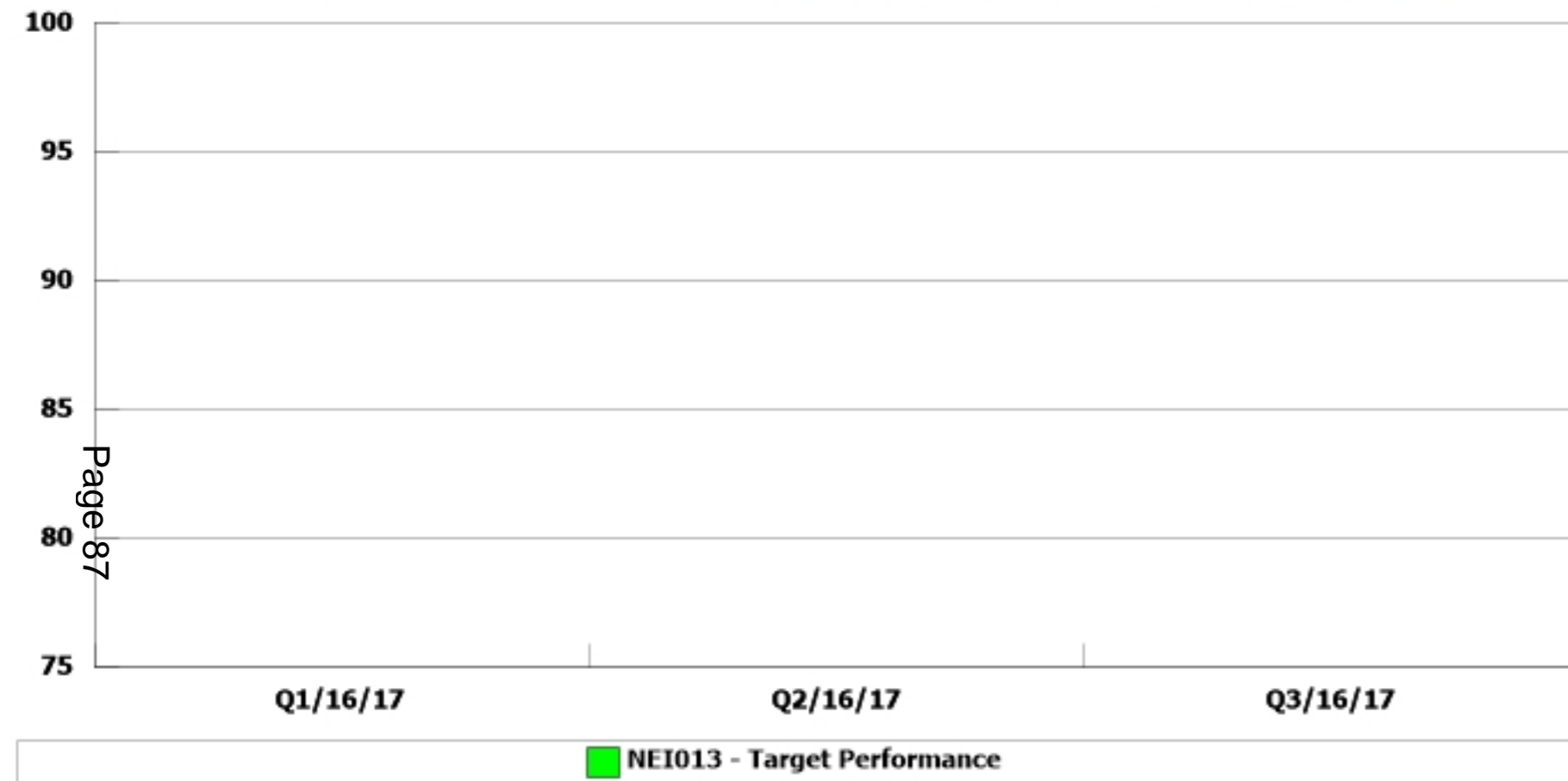
(Q3 2016/17) - Since above vacancies new terms agreed on 12-14 Broadway - currently going through planning process for change of use.
 21 The Broadway, Debden, Loughton : Terms and change of use to takeaway agreed. Lease due to commence in Feb 2017.
 7&12 Hillhouse Waltham Abbey - currently being marketed

NEI013 What percentage of all household waste was sent to be recycled or reuse?

Additional Information: This indicator supports year on year reductions in the amount of residual waste collected, and measures the percentage of household waste arisings sent for recycling or reuse.

For enquiries regarding this indicator contact the Performance Improvement Unit by email on performance@eppingforestdc.gov.uk or by telephone on 01992 564042.

Current and previous quarters performance



Quarter	Target	Actual
Q3/16/17	30.00%	25.00%
Q2/16/17	30.00%	26.09%
Q1/16/17	30.00%	22.00%



Annual Target: 2016/17 - 30.0%
 2015/16 - New Indicator
 Indicator of good performance:
 A higher percentage is good

↑ is the direction of improvement

Is it likely that the target will be met at the end of the year?

No

Comment on current performance (including context):

(Q3 2016/17) - This is a new indicator to measure the dry recycling separately from that sent for composting or anaerobic digestion (NEI014). Targets will need to be re adjusted according to trends to get an accurate target however performance is moving in the right direction.

Corrective action proposed (if required):

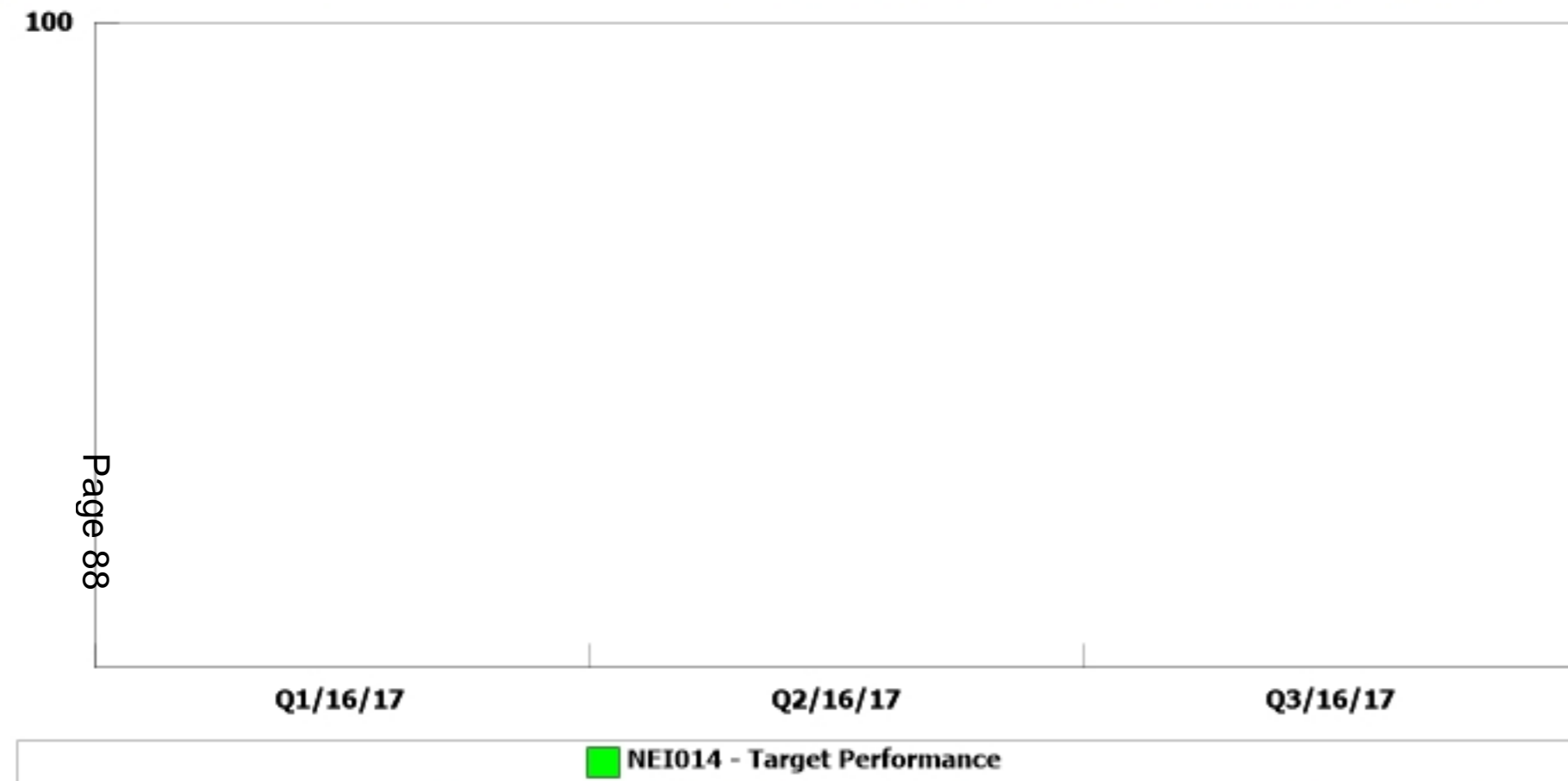
(Q3 2016/17) This is a new Indicator and is intended to focus on the dry recycling performance. It may be necessary to revise the target but it is too early to do so at this stage.

NEI014 What percentage of all household waste was sent to be composted or anaerobic digestion?

Additional Information: This indicator supports year on year reductions in the amount of residual waste collected, and measures the percentage of household waste arisings sent for composting or anaerobic digestion.

For enquiries regarding this indicator contact the Performance Improvement Unit by email on performance@eppingforestdc.gov.uk or by telephone on 01992 564042.

Current and previous quarters performance



Quarter	Target	Actual
Q3/16/17	30.00%	33.15%
Q2/16/17	30.00%	35.00%
Q1/16/17	30.00%	37.64%



Annual Target: 2016/17 - 30.0%
 2015/16 - New Indicator
Indicator of good performance:
 A higher percentage is good

↓ is the direction of improvement

Is it likely that the target will be met at the end of the year?

Yes



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Comment on current performance (including context):

(Q3 2016/17) On projected target for time of year. The target will be revised for next year to still have a target of 60% overall but to decrease the target of NEI013 and increase NEI014

Corrective action proposed (if required):

(Q3 2016/17)
 This is a new Indicator, previously reported under the total recycling indicator, the intention is to keep track of food and garden waste recycling performance. The Indicator will vary during the course of the year depending on weather and grass growing conditions.

NEI10 What was the net increase or decrease in the number of homes in the District?

Outturn			Target
2013/14	2014/15	2015/16	2016/17
299	229	267	230

Responsible Officer

Derek Macnab
Director of Neighbourhoods

Improvement Action	Target Dates	Key Measures / Milestones
<p>The current target is set taking into account recent performance. The number of new units built in the District exceeded the target in 2015/16.</p> <p>The housing target for the District will be determined in the new Local Plan. The Strategic Housing Market Assessment (2015) identified an objectively assessed housing need of 11,300 over the period 2011 – 2031, amounting to 565 units per annum. However, it is clear that this figure alone does not equate to an appropriate housing target. Work on preparing the new Local Plan is progressing, with the next public consultation event due to be held in the autumn of 2016.</p>	<p>Draft plan Preferred Approach consultation – Autumn 2016</p>	<p>Draft plan Preferred Approach consultation – Autumn 2016</p> <p>Pre-Submission representation period – Spring 2017</p> <p>Submission for Examination – Autumn 2017</p>

Please detail any budget or resource implications of the improvement actions you have listed overleaf. Please quantify any additional resources which will be required to implement the improvements and detail how the additional resources will be allocated.

The Local Plan budget is monitored and reviewed periodically to ensure sufficient resources are available to deliver the Local Plan.

Please describe any contextual factors, internal or external, which may impact upon the ability to deliver the improvements listed.

The Planning system is in a continued state of flux, and whilst best endeavours are being made to ensure the new Local Plan is delivered as quickly as possible, the significant external influences of continued changes to policy and guidance at a national level are a substantial risk.

There is a substantial level of cooperation required between Epping Forest District and several of the neighbouring authorities. At officer and Member level there are working groups that have been established to facilitate discussion and agreement on key issues, such as the levels of housing and employment growth. Until such point as agreement is reached between the authorities, there is a significant risk to the delivery of the Council's Local Plan.

Key Performance indicators review and targets 2017-18

Appendix 1

KPI Ref	Description	Target 2016/17	Q3 2016/17 Performance	Proposed Target 2017/18	Target changed Yes/No	Comments/justification for proposed target for 2017/18 and reasons for targeted reductions in performance
NEI001	How much non-recycled waste was collected for every household in the district?	kg 400	306	400	No	Although new recycling initiatives planned, full effect will not be seen until 2018/19.
				Amber tolerance = 5% below target		
NEI003	What percentage of our district had unacceptable levels of litter?	8%	9%	8%	No	Biffa have made improvements in the management of street cleansing operations. 8% should be achievable.
				Amber tolerance = 1% above target		
NEI004	What percentage of our district had unacceptable levels of detritus (dust, mud, stones, rotted leaves, glass, plastic etc.)?	10%	9%	10%	No	Maintain target for another year.
				Amber tolerance = 1% above target		
NEI005	What percentage of the issues and complaints received by the Environment & Neighbourhoods Team received an initial response within 3 days?	95.50%	98.80%	95.80%	No	Maintain as stretch target
				Amber tolerance = 1.00% below target		
NEI006	What percentage of the recorded incidences of fly-tipping are investigated within 3 working days of the fly-tip being recorded where the fly-tip is on public or privately owned land?	92.00%	98.63%	90.00%	Yes	Fly-tipping on increase due to changes of County Civic Amenity Sites.
				Amber tolerance = 1.00% below target		

Key Performance indicators review and targets 2017-18

Appendix 1

KPI Ref	Description	Target 2016/17	Q3 2016/17 Performance	Proposed Target 2017/18	Target changed Yes/No	Comments/justification for proposed target for 2017/18 and reasons for targeted reductions in performance
NEI007	What percentage of the recorded incidences of fly-tipping (contract cleared) are removed within 5 working days of being recorded?	90.00%	91.51%	90.00%	No	Maintain as stretch target
				Amber tolerance = 1.00% below target		
NEI008	What percentage of the recorded incidences of fly-tipping (variation order / non-contract) are removed within 10 working days of being recorded?	90.00%	94.24%	90.00%	No	Maintain as stretch target
				Amber tolerance = 1.00% below target		
NEI009	What percentage of out of hours noise complaints that are passed through to the duty noise officer are responded to within 15 minutes?	90.00%	92.38%	90.00%	No	Maintain as current target
				Amber tolerance = 1.00% below target		
NEI010	What was the net increase or decrease in the number of homes in the district?	230	85	315	Yes	Some new incentives are contained within the housing white paper to encourage developers to bring forward sites and therefore may need to be reviewed the following year. However it is proposed to set annual targets in line with the Local Plan residential trajectory.
				Amber tolerance = within 5% below target		

Key Performance indicators review and targets 2017-18

Appendix 1

KPI Ref	Description	Target 2016/17	Q3 2016/17 Performance	Proposed Target 2017/18	Target changed Yes/No	Comments/justification for proposed target for 2017/18 and reasons for targeted reductions in performance
NEI011	What percentage of the rent we were due to be paid for our commercial premises was not paid?	2.5%	1.8%	2.0%	Yes	Slight increase in target to reflect improved performance.
				Amber tolerance = 0.5% above target		
NEI012	What percentage of our commercial premises was let to tenants?	98.00%	97.42%	98.00%	No	Maintain current target
				Amber tolerance = 1.00% below target		
NEI013	What percentage of all household waste was sent to be recycled or reuse?	30.00%	25.00%	26.00%	Yes	Newly introduced indicator for 16/17 which has been kept under review. Change proposed to reflect this year's collection figures.
				Amber tolerance = 2% below target		
NEI014	What percentage of all household waste was sent to be composted or anaerobic digestion?	30.00%	33.15%	33.00%	Yes	As above
				Amber tolerance = 2% below target		

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