



CABINET Tuesday, 11th July, 2017

You are invited to attend the next meeting of Cabinet, which will be held at:

Council Chamber, Civic Offices, High Street, Epping on Tuesday, 11th July, 2017 at 7.00 pm.

Glen Chipp Chief Executive

Democratic Services

Gary Woodhall

Officer

(Governance Directorate) Tel: (01992) 564470

Email: democraticservices@eppingforestdc.gov.uk

Members:

Councillors C Whitbread (Leader of the Council) (Chairman), S Stavrou (Deputy Leader and Housing Portfolio Holder) (Vice-Chairman), W Breare-Hall, A Grigg, H Kane, A Lion, J Philip, G Mohindra and G Waller

PLEASE NOTE THE START TIME OF THE MEETING

1. WEBCASTING INTRODUCTION

- (a) This meeting is to be webcast;
- (b) Members are reminded of the need to activate their microphones before speaking; and
- (c) the Chairman will read the following announcement:

"I would like to remind everyone present that this meeting will be broadcast live to the Internet and will be capable of subsequent repeated viewing, with copies of the recording being made available for those that request it.

By being present at this meeting, it is likely that the recording cameras will capture your image and this will result in your image becoming part of the broadcast.

You should be aware that this may infringe your human and data protection rights. If you have any concerns then please speak to the Webcasting Officer.

Please could I also remind Members to activate their microphones before speaking."

2. APOLOGIES FOR ABSENCE

(Director of Governance) To be announced at the meeting.

3. DECLARATIONS OF INTEREST

(Director of Governance) To declare interests in any item on this agenda.

4. MINUTES

To confirm the minutes of the last meeting of the Cabinet held on 15 June 2017 (previously circulated).

5. REPORTS OF PORTFOLIO HOLDERS

To receive oral reports from Portfolio Holders on current issues concerning their Portfolios, which are not covered elsewhere on the agenda.

6. PUBLIC QUESTIONS AND REQUESTS TO ADDRESS THE CABINET

(Director of Governance) To receive any questions submitted by members of the public and any requests to address the Cabinet.

(a) Public Questions

To answer questions asked by members of the public after notice in accordance with the provisions contained within Part 4 of the Constitution (Council Rules, rule Q3 refers) on any matter in relation to which the Cabinet has powers or duties or which affects the District.

(b) Requests to Address the Cabinet

Any member of the public or a representative of another organisation may address the Cabinet on any agenda item (except those dealt with in private session as exempt or confidential business) due to be considered at the meeting, in accordance with the provisions contained within Article 7 of the Constitution (The Executive, paragraphs 27 & 28 refers).

7. OVERVIEW AND SCRUTINY

- (a) To consider any matters of concern to the Cabinet arising from the Council's Overview and Scrutiny function.
- (b) To consider any matters that the Cabinet would like the Council's Overview and Scrutiny function to examine as part of their work programme.

8. HOUSING STRATEGY 2017-22 (Pages 5 - 100)

(Housing Portfolio Holder) To consider the attached report (C-006-2017/18).

9. LOCAL COUNCIL TAX SUPPORT SCHEME 2018/19 (Pages 101 - 112)

(Finance Portfolio Holder) To consider the attached report (C-007-2017/18).

10. EPPING FOREST DISTRICT DRAFT LOCAL PLAN REGULATION 18 CONSULTATION RESULTS (Pages 113 - 148)

(Planning & Governance Portfolio Holder) To consider the attached report (C-008-2017/18).

11. TRANSFORMATION PROGRAMME MONITORING REPORT - APRIL & MAY 2017 (Pages 149 - 156)

(Leader of Council) To consider the attached report (C-009-2017/18).

12. ANY OTHER BUSINESS

Section 100B(4)(b) of the Local Government Act 1972 requires that the permission of the Chairman be obtained, after prior notice to the Chief Executive, before urgent business not specified in the agenda (including a supplementary agenda of which the statutory period of notice has been given) may be transacted.

13. EXCLUSION OF PUBLIC AND PRESS

Exclusion

To consider whether, under Section 100(A)(4) of the Local Government Act 1972, the public and press should be excluded from the meeting for the items of business set out below on grounds that they will involve the likely disclosure of exempt information as defined in the following paragraph(s) of Part 1 of Schedule 12A of the Act (as amended) or are confidential under Section 100(A)(2):

Agenda Item No	Subject	Exempt Information Paragraph Number		
14	Disposal of Pyrles Lane	3		
	Nursery			

The Local Government (Access to Information) (Variation) Order 2006, which came into effect on 1 March 2006, requires the Council to consider whether maintaining the exemption listed above outweighs the potential public interest in disclosing the information. Any member who considers that this test should be applied to any currently exempted matter on this agenda should contact the proper officer at least 24 hours prior to the meeting.

Background Papers

Article 17 of the Constitution (Access to Information) define background papers as being documents relating to the subject matter of the report which in the Proper Officer's opinion:

(a) disclose any facts or matters on which the report or an important part of the

report is based; and

(b) have been relied on to a material extent in preparing the report and does not include published works or those which disclose exempt or confidential information and in respect of executive reports, the advice of any political advisor.

The Council will make available for public inspection one copy of each of the documents on the list of background papers for four years after the date of the meeting. Inspection of background papers can be arranged by contacting either the Responsible Officer or the Democratic Services Officer for the particular item.

14. DISPOSAL OF PYRLES LANE NURSERY (Pages 157 - 172)

(Asset Management & Economic Development Portfolio Holder) To consider the attached restricted report (C-010-2017/18).

Report to the Cabinet

Report reference: C-006-2017/18
Date of meeting: 11 July 2017



Portfolio: Housing

Subject: Housing Strategy 2017 – 22.

Responsible Officer: Alan Hall (01992 564004)

Committee Secretary: Gary Woodhall (01992 564470)

Recommendations:

- (1) That, following the support and endorsement of the Communities Select Committee, the new Housing Strategy 2017-2022 (attached as Appendix 1) be adopted; and
- (2) That the Communities Select Committee be asked to continue to review future Annual Key Action Plans for the Housing Strategy prior to approval each year, and to review progress with Key Action Plans every 6 months, in accordance with its previous practice.

Executive Summary

The Council's current Housing Strategy is out of date, so a new Housing Strategy covering the period 2017-2022 has been produced by officers, and is attached as an Appendix.

The new Housing Strategy has been delayed, for the reasons set out in the report, but in the meantime an annual Housing Strategy Key Action Plan has continued to be produced, with progress monitored by the Communities Select Committee. However, now is a good time to update the Housing Strategy. The new Housing Strategy includes a Key Action Plan for the first year of the Strategy, which will be updated on an annual basis. It is proposed that progress with the Key Action Plan continues to be reviewed by the Communities Select Committee every 6 months.

The Communities Select Committee has been consulted on the Draft Housing Strategy, which they felt was a good quality and useful document, and therefore agreed to endorse and support its adoption.

Reasons for Proposed Decision:

The current Housing Strategy is in need of updating, since the current Housing Strategy was produced 8 years ago and it is accepted good housing and local government practice to have an up to date Housing Strategy.

Other Options for Action:

- (a) Not to produce an updated Housing Strategy;
- (b) To further defer production of an updated Housing Strategy; or
- (c) To have a different Housing Strategy to the one proposed.

Report:

- 1. In 2009, the Cabinet adopted the Council's current Housing Strategy. Although there is no longer any legal or policy requirement, it is accepted good housing and local government practice to have an up to date Housing Strategy. An updated Housing Strategy has therefore been produced by officers, which covers the period 2017-2022 and is attached as an Appendix.
- 2. The Housing Strategy has been produced with contributions from a number of senior officers in the Housing Service and the Planning Policy Team, which the Director of Communities has collated and edited to ensure a consistent approach, format and language throughout the document.
- 3. The update to the Housing Strategy has been delayed from when it was originally due to be produced, since the former Housing Portfolio Holder had previously agreed that it should not be updated until the Draft Local Plan had been published, because much of the Housing Strategy relates to the provisions within the Local Plan. However, it was also agreed that, in the meantime, an annual Housing Strategy Key Action Plan should continue to be produced, with progress monitored by the Communities Select Committee every 6 months until the new Housing Strategy is formulated and adopted, which the Select Committee (and predecessor bodies) has done.
- 4. However, now that: the Draft Local Plan has been published; the outcome of Stage 1 of the Council's HRA Financial Options Review has been determined by the Cabinet; and the contents of the last Government's Housing White Paper are known; the Council is now in a good position to update its Housing Strategy.
- 5. The purpose of the Housing Strategy is to assess the District's current and future housing needs, and to set out the Council's approach to meeting those needs. The Strategy sets out a suggested overall Vision for housing in the District (based on the District's former Community Strategy), the Council's key housing objectives and the aims and objectives relating to individual housing issues. It also provides a Key Action Plan for the first year of the Strategy, which will be updated on an annual basis. It is proposed that progress with the Key Action Plan continues to be reviewed by the Communities Select Committee every 6 months.
- 6. It should be noted that the Housing Strategy does <u>not</u> cover the aims, objectives and actions of the Council as landlord, except for those aspects that contribute to the Strategy (e.g. Council housebuilding).

Resource Implications

None of the proposals within the Draft Housing Strategy have budgetary implications that have not already been included within the Council's budgets or Capital Programme. However, any additional budgetary requirements that do flow from the Housing Strategy in the future will be considered and approved on their own merits by the Cabinet in the usual way.

Legal and Governance Implications

The contents of the Housing Strategy are covered by a number of statutes.

Safer, Cleaner and Greener Implications

A number of the actions will result in a safer and cleaner environment, particularly those actions relating to development, many of which include environmental and energy efficiency

measures to the new properties.

Consultation Undertaken

At the meeting of the Communities Select Committee on 20th June 2017, the Housing Portfolio Holder invited the Select Committee to consider, pre-scrutinise and provide her with any comments on the Draft Housing Strategy for her to consider, before it was presented to this meeting of the Cabinet for consideration and adoption.

The Select Committee suggested a couple of minor comments, which have been incorporated in the final version. The Select Committee also commented on the quality and comprehensiveness of the Housing Strategy, which they found to be a useful document, and therefore supported and endorsed its adoption.

Background Papers

None.

Risk Management

The risks of adopting the Housing Strategy are minimal. The risks of individual proposals will be managed in accordance with the Council's established Risk Management Framework.

Equality Analysis

The Equality Act 2010 requires that the Public Sector Equality Duty is actively applied in decision-making. This means that the equality information provided to accompany this report is essential reading for all members involved in the consideration of this report. The equality information is provided as an Appendix to this report.



Equality Impact Assessment

Section 1: Identifying details

Your function, service area and team: Communities Support, Communities Directorate

If you are submitting this EqIA on behalf of another function, service area or team, specify the originating function, service area or team:

Title of policy or decision: Housing Strategy 2017-22

Officer completing the EqIA: Mary Masterson Tel: X2132 Email: mmasterson@eppingforestdc.gov.uk

Date of completing the assessment: 16th June 2017

Section 2: Policy to be analysed

2.1 Is this a new policy (or decision) or a change to an existing policy, practice or project?

The Housing Strategy 2017-22 replaces the Housing Strategy 2009-2012.

2.2 Describe the main aims, objectives and purpose of the policy (or decision):

This strategy is a framework setting direction for everyone involved in housing in the District, to do what we can to provide the homes needed and ensure that housing delivers a clear social value.

The purpose of the Housing Strategy is to assess the District's current and future housing needs, and to set out the Council's approach to meeting those needs. The Strategy sets out a suggested overall vision for housing in the District, the Council's key housing objectives and the aims and objectives relating to individual housing issues.

This Housing Strategy has six key objectives. These are:

- 1. To ensure that plans are in place and sufficient land is allocated to meet the assessed housing need for the District, including the need for affordable housing;
- 2. To ensure that the growth in the number of homes in the District is properly planned, along with adequate infrastructures such as roads, health facilities, and schools (i.e sustainable);
- 3. To make affordable housing available both for rent and for low cost home ownership in rural and urban locations, for people who want to live in the District;
- 4. To ensure that people with special needs are able to live in suitable accommodation with appropriate levels of support;
- 5. To quickly accommodate homeless people in suitable, permanent accommodation; and
- 6. To ensure that all homes in the District, in both the public and private sector, are in a decent condition.

It also provides a Key Action Plan for the first year of the Strategy, which will be updated on an annual basis. It is proposed that progress with the Key Action Plan continues to be reviewed by the Communities Select Committee every 6 months.

Some actions will require a specific equalities impact assessment in order to fully evaluate the effect the changes could have on equalities groups. Therefore this impact assessment is intended to give an overview of the potential impacts based on proposals set out within the Housing Strategy 2017 – 2022 and is not intended to fully assess the impacts of subsequent actions set out within the action plan.

What outcome(s) are you hoping to achieve (ie decommissioning or commissioning a service)?

That the Epping Forest District will be a district that has safe, decent and attractive housing that meets the needs of those who want to live in the District.

2.3 Does or will the policy or decision affect:

- service users
- employees
- the wider community or groups of people, particularly where there are areas of known inequalities?

Yes - all of the above.

Will the policy or decision influence how organisations operate?

Possibly. This will become apparent as the key actions are carried out over the five year period.

2.4 Will the policy or decision involve substantial changes in resources?

None of the proposals within the Draft Housing Strategy have budgetary implications that have not already been included within the Council's budgets or Capital Programme. However, any additional budgetary requirements that do flow from the Housing Strategy in the future will be considered and approved on their own merits by the Cabinet in the usual way.

2.5 Is this policy or decision associated with any of the Council's other policies and how, if applicable, does the proposed policy support corporate outcomes?

This Housing Strategy is only one of a range of complementary and inter-related strategic documents and plans produced by the Council. It is also influenced by a number of strategies produced by other agencies. In formulating the Housing Strategy, careful regard has been given to relevant corporate objectives and strategies:

EFDC Corporate Plan (2015-20) - the Council's prime strategic document, that sets out the Council's priorities for the planning and delivery of services over a five-year period.

District Local Plan - the Council's prime town planning document that sets out all the Council's town planning policies and land allocations. The current Local Plan is in the process of being updated. A new Draft Local Plan was published for consultation in October 2016 and, following analysis and consideration of the comments received, a Pre-Submission Local Plan will be produced in Spring 2018.

Government housing policy and legislation - clearly, the Council must comply with legislation, which is often updated and influences and affects the Council's delivery of its Housing Strategy. Similarly, Government housing policy (which often results in legislation) has an influence on the Housing Strategy as well. The Government's latest housing policy was set out in its White Paper "Fixing our broken housing market" published in February 2017, which has influenced this Housing Strategy.

EFDC Business Plans - each of the Council's Directorates produces an annual Business Plan, in support of the EFDC Corporate Plan, setting out the key actions and resource requirements for the forthcoming year.

Section 3: Evidence/data about the user population and consultation¹

As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, eg service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).

3.0 Reference Material

Age Disability Gender reassignment partnership partnership Race Race Sexual orientation

Age



2011 ONS EFDC Area Age Structure

Age	%	Age	%	Age	%	Age	
0-4	5.9% (7366)	15	1.2% (1519)	25-29	5.3% (6624)	65-74	9.2% (11464)
5-7	3.4% (4193)	16-17	2.5% (3094)	30-44	20.5 (25542)	75-84	6.2% (7743)
8-9	2.1% (2638)	18-19	2.2% (2771)	45-59	21% (26169)	85-89	1.7% (2178)
10-14	5.8% (7235)	20-24	5.3% (6663)	60-64	6.7% (8295)	90+	0.9% (1165)

- 1. 45-59 yrs 21% (26169)
- 2. 30-44 yrs 20.5 (25542)
- 3. 65-74 yrs 9.2% (11464)
- 4. 60-64 yrs 6.7% (8295)

- 5. 75-84 yrs 6.2% (7743)
- 6. 0-4 yrs 5.9% (7366)
- 7. 0-14 yrs 5.8% (7235)

ONS Census Data 2011

Homeless (Statutory) 2017

Total as of 31 March 2017 (all age ranges)

116 - Temporary accommodation

31 - B&B

45 - Hostel

40 - Other

EFDC KPI COM004 - How many households were housed in temporary accommodation

The number of households in temporary accommodation provided under homelessness legislation has increased: -

Q4 - 116

2016-17 (all age ranges)

ONS Subnational population projections for England 2012 – based on 2011 Census

- 22.3% of the EFD population is aged 65 years and over and life expectancy is increasing;
- 5% population growth rate for the Epping Forest District.

EFDC Repairs and Improvements & Repairs recharge costs 2017

Council residents are able to report the faults by phone, email or via the mobile app.

https://www. gov.uk/natio nalminimumwage-rates

National Minimum wage

National Living Wage and the National Minimum Wage changed in April 2017.

The national minimum wage is based on a target to reach 60% of median earnings by 2020. Under current forecasts this means a rise to less than £9 per hour by 2020.

 Year
 25 and over
 21 to 24
 18 to 20
 Under 18
 Apprentice

 April 2017
 £7.50
 £7.05
 £5.60
 £4.05
 £3.30

www.livingw age.org.uk

The Living wage

UK rate - £8.45 London rate £9.75

The living wage is independently-calculated each year based on what employees and their families need to live. The employers choose to pay the real living wage on a voluntary basis.

Impact of an ageing population study Epping Forest District

- Between 2015 and 2025 it is anticipated that the number of over 65's in Epping Forest will increase from 25,400 to 30,000 and over 50's 64's, from around 24,200 to 27,400.
- Services in preventative healthcare and activities to help people to remain active and health in later life, could help increase the proportion of life spent in good health and reduce costs to a wide range of organisations.
- Loughton Alderton is one of the wards that have some of the lowest life expectancy and this is identified as being linked to deprivation and less positive lifestyles.
- It is evidenced that good physical and mental health are essential to living longer and having a better quality of life.
- 2013 there were 1,855 Dementia suffers, by 2025 the number is expected to be 2,553 (37.6%).



Epping-Forest-Dra Local-Plan-SINGLE

Ageing population – will require dwellings that are adaptable and accessible for disabilities/ Pg 13 Paragraph 2.4 states:

"The District's population increased by almost 17,000 between 1961 and 2011. Government estimates that the District's population had risen by just over 5,000 since 2011."

"In 2011, compared to the rost of England, the District had smaller proportions of populations."

"In 2011, compared to the rest of England, the District had smaller proportions of people aged under 30 and a larger proportion of people aged 45 to 64 years and 65 years and over." "by 2033, projections suggest the proportion of people aged over 65 years will rise sharply compared to the other age bands"

& <u>BGP1</u> <u>Housing</u> <u>Background</u> <u>Paper</u>

	Affordable Housing Need (in households)*						
	East Herts DC	Epping Forest DC	Harlow DC	Uttlesford DC	HMA Total		
Unmet need for affordable housing in 2011							
Total unmet need for affordable housing	1,632	1,171	1,597	818	5,218		
Supply of housing vacated	471	544	849	242	2,106		
Overall impact of current affordable housing need	1,161	627	748	576	3,112		
Future need for affordable housing 2011-33	4,128	3,152	3,289	2,724	13,291		
Percentage of overall housing need	31%	34%	67%	27%	35%		

The above table (Epping Draft Local Plan) shows the projected need for affordable housing (measured in households) in the District from 2011-2033 (for households not dwellings). These figures take into account current unmet need for affordable housing and starter homes, projected future need arising from new households which will form in the future, and also the number of existing households which are likely to fall into need in the future.

'3,152 of the new homes need to be affordable'
Ageing population. Demand on health services. Need dwellings that are accessible and adaptable.

Strategic Housing Market Assessment for West Essex & East Herts 2015 Pg101 & 108

- ECC demand analysis assessment identified a shortfall in independent living units.
- EFDC needs to provide appr [2] age 12300 (market housing & affordable) new homes over the

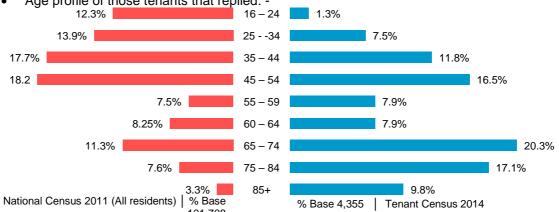
- Local Plan period (up to 2033) (specific split of houses vs. flats, numbers of bedrooms etc).
- Older people are living longer, healthier lives and specialist housing offered today may not be appropriate for the future years.
- Accessible housing in the district is needed with a view of adaptable lifetime homes.
- Government's reform of Health and Adult Social Care is underpinned by sustaining people at home for as long as possible. Dwellings to meet cat. 2 requirements (dependent on viability).



Over half of all tenants (57%) responded

At the time of the Tenant census the respondents were older than the wider EFD population, with a median age of tenants being 63 compared to 48 for the overall population of EFDC.

Age profile of those tenants that replied: -



- Wards with an elderly population with a median age over 70:
 - Lower Nazeing (median age 71)
 - Waltham Abbey North East (71)
 - North Weald Bassett (72)
 - o Moreton and Fyfield (73)
- Wards with the youngest tenants: -
 - Grange Hill (47)
 - o Loughton Fairmead (56)
 - Loughton Roding (56)
 - Waltham Abbey Honey Lane (57)
 - Waltham Abbey South West (58)

Age by receipt of housing benefit						
Age group	Yes	No				
16-24 yrs	<mark>76.8</mark>	<mark>23.2</mark>				
25-34 yrs	64.0	36.0				
35-44 yrs	67.1	32.9				
45-54 yrs	62.9	37.1				
55-59	61.8	38.2				
60-64 yrs	67.5	32.5				
65-74	72.5	<mark>27.5</mark>				
75-84 yrs	<mark>75.1</mark>	<mark>24.9</mark>				
85 yrs and over	<mark>77.2</mark>	<mark>22.8</mark>				

Household size by receipt of housing benefit							
Household size Yes No							
One	77.0	<mark>23.0</mark>					
Two	67.4	32.6					
Three	63.4	36.6					
Four	56.7	43.3					
Five	58.2	41.8					
Six or more	59.8	40.2					

- The youngest and oldest age groups were more likely to be claiming housing benefit (HB).
- Middle age groups less likely to be receive financial support, as economically active.
- Lone tenants more likely to receive HB (77%) compared to any other households sizes.

EFDC
Housing
Register &
housingallocationsscheme2015-v3

Total number of applicants on Epping Forest District Council's Housing Register

*Priority Bands	Q1	Q2	Q3	Q4	
Housing Register	1531	1515	1477	1462	
Band A*	135	134	120	125	Urgent medical grounds/disability
Band B*	526	534	516	538	Existing Council tenants aged over 60yrs
Band C*	706	700	706	683	moderate medical grounds relating to disability
SWL	164	147	134	116	

Careline Annual Report Epping Forest Careline currently has approximately 2,500 clients. Years of experience managing a community alarm service and enabling independent living. Customers to feel more secure in their home, as help is at the press of a butter. The service is beneficial to those that feel vulnerable in some

2015-16 way: they are unwell, may have previously fallen, been injured, experienced an intruder in their property or garden or have an on-going illness or been recently discharged from hospital. A new Careline call handling provider will be used to enable the service to facilitate the demand from an increasing older generation living longer healthier independent lives. Nov 2016 random Careline survey of 300 clients (12% of the user base). 99.3% satisfied with the quality of service; 99.3% happy with time taken to respond to calls; 100% found Epping Forest Careline staff helpful; 98% service was good value for money - this was a reduction from 99.2% in 2015. There was a marginal rise in monitoring fees for the 1st time in 3 years which may account for this. 99.3% found equipment easy to use; 100% would recommend Epping Forest Careline to friends and family; 347 new installations across the district in 2016. Yearly call total - 61,162, averaging 168 daily; **Sheltered** EFDC provides sheltered housing for older residents that are capable of living on their own **Housing** but feel more secure with the support of a visiting Scheme Manager; Guide Self-contained flats, bungalows and studios. Housing with communal lounge -social activities; Currently located in Loughton, Watham Abbey, Buckhurst Hill and Epping. Once the new Careline provider is agreed a Sheltered Housing Review will be undertaken to identify all future options for the current properties and provide recommendations. **Downsizing** EFDC enables older residents to downsize to a smaller more manageable property; **Scheme** Financial incentive as they could be eligible for a lower rent and receive up to £4,000; £1000 for each room "released", plus £500 for removal expenses and £500 to meet decoration costs. Younger larger families will benefit from these properties becoming available. C.A.R.E Through the Caring and Repairing in Epping Forest (C.A.R.E) Home Improvement Agency, **Home** the Council seeks to assist older people and disabled home owners to improve, repair or **Improvemen** adapt their houses. They may also assist with home improvements to: t Agency prevent hospital admission; support prompt discharge from hospital. Handyperso C.A.R.E. provides a handy person service to retired home-owners / private tenants over the n Scheme age of 60 years. Vetted contractors carry out small, low cost repairs / home security work, **EFDC** fall prevention measures. Chargeable service (lower for those on means tested benefits). The Health Countries which have more efficient housing have lower Excess Winter Deaths (EWDs) Impacts of Link between EWDs, low thermal efficiency of housing / low indoor temperature (SAP rating). **Cold Homes** EWDs are almost three times higher in the coldest quarter of housing than in the warmest. and Fuel 21.5% of all EWDs are linked to the coldest quarter of housing. **Poverty** Around 40% of EWDs are attributable to cardiovascular diseases. leaflet • Around 33% of EWDs are attributable to respiratory diseases. (2011)• Strong relationship between cold temperatures and cardio-vascular and respiratory diseases. Cold housing negatively affects: o dexterity and increases the risk of accidents and injuries in the home children's educational attainment, emotional well-being and resilience & twice likely to suffer from a variety of respiratory problems Fuel poverty negatively affects dietary opportunities and choices. "The annual cost to the NHS of treating winter related disease due to cold private housing is £859 million. This does not include additional spending by social services, or economic losses through missed work. The total costs to the NHS and the country are unknown. A recent study showed that investing £1 in keeping homes warm saved the NHS 42 pence in health costs..." [Chief Medical Officer Report, 2009] private-EFDC meets the Decent Home Standard for all their housing stock. sector-The Decent Home Standard originally applied to housing stock owned by Local Authorities housingand Registered Social Landlords, in 2007 the Government applied the standard to vulnerable strategyhouseholds in the private sector by Target 7 of the Public Services Agreement (PSA7). 2012-2015 Vulnerable groups were those that suffered health problems as a result of living in poor housing conditions which they do not have the resources to remedy themselves e.g. those over 60, people with a long term illness or a disability or families with children. In addition they will be in receipt of income or disability related benefits.

housing-

EFDC Housing Assistance Policy 2012/2017 provides guidance on how EFDC will offer

assistancepolicy-15-17 financial assistance (Housing Assistance) (subject to funds) for work or repair, renewal or adaptation in the private sector housing.

EFDC Youth Conference

Research: 11-17 age group: Biggest issues facing young people today was, 28% said alcohol.

Disability



- 30.2%% stated they had a disability
- 34% of households contained at least one person who had a disability
- North Weald Bassett Ward contained the highest proportion of tenants with a disability (39%), followed by Waltham Abbey North East (38%). These Wards had a higher than average number of older residents.
- Grange Hill Ward youngest population, smallest proportion of tenants with a disability (1.4%)
- Under a third of tenants stated they had a disability (30.2%), higher than the overall population of EFDC (15.7%).
- Of those tenants with hearing difficulties, 14 use British Sign Language, 45 use lip reading.

EFDC
Housing
Register &
housingallocationsscheme2015-v3

Total number of applicants on Epping Forest District Council's Housing Register

*Priority Bands	Q1	Q2	Q3	Q4	
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Band C*	706	700	706	683	moderate medical grounds relating to disability
SWL	164	147	134	116	



Strategic-Housing arket-Assessment

- Pg 108: Report supports the need for 15% of affordable housing to meet Category 3 requirement to aide accessibility for wheelchair users.
- Currently, 1-30 households in England (3.3%) have at least one wheelchair user. These proportions are likely to increase over the period to 2033.
- Therefore, adaptable accessible housing is needed.

Local
Authority
District Indices of
Deprivation
via
www.gov.uk

Mental Health JSNA

Mental Health JSNA Page 31

"...70% of people accessing homelessness services have a mental health problem. Many of these people do not receive the support they need to overcome their mental health and substance misuse problems."

Within this document it states:-

"a survey of 152 homeless people in Essex.." "..the majority suffered from stress, anxiety or depressions. 84% of participants experienced at least 1 of these and 63% experienced all three."

Nearly half reported using drugs and alcohol as coping mechanisms. Approx. 41% had been diagnosed with a mental health condition (0.7% of the Essex population is on a GP Mental Health Conditions Register). Approx. 1 third with mental health issues are currently receiving support.

Decent Home Definition

EFDC meets the Decent Home Standard.

To meet the Decent Homes Standard the Council or Housing Association home must: -

- Meet the HHSRS minimum safety standards for housing
- Be in a reasonable state of repair
- Have reasonably modern facilities and services
- Have efficient heating and effective insulation.

If the property does not meet all four of the criteria it will fail the Decent Home Standard.

<u>C.A.R.E Home Improvement Agency</u>, <u>disabled-facilities-grant</u>, <u>decent-homes-repayable-assistance</u>, & small-works-repayable-assistance

Financial assistance and grants to home owners, private tenants and landlords: -

- **Disabled Facilities Grant up to £30,000**; adapting to the homes of disabled owner-occupiers / private tenants are governed by the 'Housing Grants Construction and Regeneration Act 1996'
- Decent Homes Repayable Assistance up to £10,000; financial assistance (loan) to bring private sector dwellings up to the 'Decent Homes Standard', introduced by the Government to assess the condition of homes. Assistance may be available where there is a significant hazard

- within the property, or disrepair, which breaches the standard.
- Small Works Repayable Assistance up to £3,000; financial assistance may be available where there is a hazard as defined under the Housing Health and Safety Rating System (HHSRS) or a defect which is likely to damage the fabric of a property unless it is repaired.
- Empty Homes Repayable Assistance up to £10,000.
- Energy efficiency works; Limited funding available for EFDC homeowners / private tenants who are disabled / over 60 and on a means tested benefit to assist with energy efficiency measures.

EFDC Repairs and Improvements & Repairs recharge costs 2017

Council residents are able to report the faults by phone, email or via the mobile app.

ECC Independent Living Programme Position Statement (published Oct2016)

Pg 7:ECC's most recent assessment of need for Independent Living Accommodation in the Epping Forest District shows a shortfall of 44 rental units and 143 market ILA homes are required by 2020.

Essex coalition of disabled people (ECDP)

- Disabled people are underrepresented in the workplace and work with employers is required to increase the number of disabled adults in the work place.
- Almost half (48%) of disabled people were dissatisfied with access to high street services in general. This is despite the view that 'things are slowly getting better' 65% of respondents felt that there had been no improvement to disabled access in the past five years.

http://www.ecdp.org.uk/ & http://www.bluebadgestyle.com/

The Health Impacts of Cold Homes and Fuel Poverty leaflet (2011)

- Mental health is negatively affected by fuel poverty and cold housing for any age group.
- More than 1 in 4 adolescents living in cold housing are at risk of multiple mental health problems compared to 1 in 20 adolescents who have always lived in warm housing.
- Cold housing increases the level of minor illnesses such as colds and flu and exacerbates existing conditions such as arthritis and rheumatism.
- Improving the energy efficiency of the existing stock is a long-term, sustainable way of ensuring multiple gains, including environmental, health and social.

Gender



Epping Forest district population: -

- 64219 51.5% female
- 60440 48.5% male

Chapter 2 Setting the Scene EFDC

		Epping Forest (%)	East of England (%)	England (%)
All people aged 16-64	Economically Active	80.4	80.2	78
	In Employment	76.9	77	73.9
	Employees	63	66.4	63.1
	Self Employed	13.9	10.3	10.4
	Unemployed	3.4	3.8	5.1
Males aged 16-64	Economically Active	86.6	86.2	83.6
	In Employment	80.4	82.7	79.2
	Employees	59.5	68.7	64.7
	Self Employed	20.9	13.8	14.1
	Unemployed	#	3.9	5.1
Females aged 16-64	Economically Active	74.5	74.3	72.5
	In Employment	73.5	71.4	68.8
	Employees	66.2	64.3	61.6
	Self Employed	#	6.8	6.8
	Unemployed	#	3.8	5

These numbers are not available as Government's sample size is too small to provide an estimate, or because the numbers are so small they would disclose personal data.

Gender All persons Males Females
Occupation

Page 16

All categories: Occupation	61,609	32,614	28,995
Managers, directors and senior officials	9,051	6,071	2,980
2. Professional occupations	10,107	5,112	4,995
3. Associate professional and technical occupations	9,039	5,265	3,774
4. Administrative and secretarial occupations	9,269	1,624	7,645
5. Skilled trades occupations	7,167	6,481	686
6. Caring, leisure and other service occupations	4,845	766	4,079
7. Sales and customer service occupations	3,681	1,261	2,420
8. Process plant and machine operatives	3,839	3,521	318
9. Elementary Occupations	4,611	2,513	2,098

Economic Activity – Epping Forest District Council	Total	Male	female
All usual residents aged 16-74	90,622	44,089	46,533
Economically active	65,304	34,651	30,653
In employment	59,936	31,837	28,099
Employee: Part-time	12,023	2,105	9,918
Employee: Full-time	34,722	19,966	14,756
Self-employed	13,191	9,766	3,425
Unemployed	3,259	1,819	1,440
Full-time student	2,109	995	1,114
Economically inactive	25,318	9,438	15,880
Retired	12,746	5,308	7,438
Student (including full-time students)	4,055	2,005	2,050
Looking after home or family	4,459	261	4,198
Long-term sick or disabled	2,378	1,189	1,189
Other	1,680	675	1,005
Unemployed: Age 16-74	922	563	359
Unemployed: Age 50-74	655	418	237
Unemployed: Never worked	438	250	188
Long-term unemployed	1,298	672	626

Safer-Places

Independent domestic abuse charity supporting adults and children affected by domestic abuse.

• Offers advice and information, safe refuge accommodation, community-based floating support, counselling, legal services, training and access to work.

Marriage / Civil Partnerships



	All persons	Males	Females
All categories: Living arrangements	100,672	48,322	52,350
Living in a couple	60,592	30,292	30,300
Married or in a registered same-sex civil partnership	49,472	24,745	24,727

	Living arrangements		
Age	All categories:	couple	Married/in a registered same-sex civil partnership
16-19	5,862	72	1
20-24	6,652	870	127
25-29	6,614	3,005	1,223
30-34	7,506	4,923	3,295
35-39	8,367	6,107	4,614
40-44	9,630	6,996	5,524
45-49	9,909	7,378	6,104
50-54	8,609	6,414	5,526
55-59	7,602	5,707	5,101
60-64	8,266	6,278	5,769
65-69	6,394	4,683	4,371
70-74	4,980	3,314	3,158
75-79	4,193	2,547	2,451
80-84	3,294	1,536	1,482
85+	2,794	762	726_
		Pad	le 1 /

Safer-Places

- Independent domestic abuse charity dedicated to supporting adults and children affected by domestic abuse. Provides a range of services to support and respond to individual's needs and circumstances, either in refuge accommodation or in the community. A holistic approach to empower individuals enabling an independent life free from domestic abuse.
- Offers advice and information, safe refuge accommodation, community-based floating support, counselling, legal services, training and access to work. Specialist support for young people, the over 60's, the LGBT and the BMER community and for victims/survivors with substance misuse or mental health problems.
- Located in West Essex, Mid Essex, Hertfordshire and the Southend district, providing supported accommodation for male or female victims/survivors and their children who have experienced domestic abuse. Support service on all projects includes:
- After leaving Safer Places, families are referred to the Outreach Team for continued support.

Equality Careline Data

0.8% of Careline Clients are connected due to threats of domestic violence



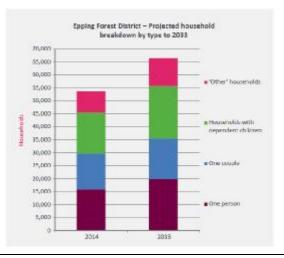
Strategic-Housing arket-Assessment

- Population projection information gathered from the census shows the changing of household trends and provision for the future needs for existing families and new family unit trends.
- EFDC needs to provide approximately 11,300 (as mentioned above)
- The approximate affordable housing need by tenure and dwelling size 3,200.

Pregnancy / maternity & Dependents/Carers



Epping-Forest-Dra Local-Plan-SINGLE



'It is expected that the total number of households (a household being a single person who lives alone, or a group of people who live together) in 2011 was roughly 52,000. This is expected to rise to approximately 66,460 by 2033. The household projections suggest that by 2033, there will be proportionately more households consisting of one person, or a family with dependent children, and proportionately less households consisting of one couple.'

Affordable Rents Policy

The Council Housebuilding Cabinet Committee approved the recommendations to: -

- Charge affordable rents for Council properties built under the Council's Housebuilding Programme be re-affirmed;
- 2. Properties (re)let, the Council's affordable rents be set at a level equivalent to the lowest of:
 - a. 80% of market rents for the locality in which the property is situates, as assessed by the Council's Estates and Valuations Division;
 - b. The Local Housing Allowance level for the Broad Market Rental Area (BMRA) in which the property is situated; and
 - c. A rent cap of £180 per week, irrespective of the size of the property.
- 3. Affordable rent be increased annually by the Retail Price Index (as at the preceding September) + 0.5% (or any other maximum increase determined by the Government), until the tenant vacates, when the affordable rent will be re-based in accordance with the Homes and Communities Agency's (HCA's) Affordable Rent Model and the policy at (2)
- Council's rent cap level be reviewed annually by the Council Housebuilding Cabinet Committee; and
- 5. That the Director of Housing be authorised to enter into Short Form Agreements with the Homes and Communities Agency for all developments, to enable affordable rents to be charged for the properties built under the Housebuilding Programme, and the 'Provider Representative' names in the Agreements be a senior figure at East Thames Group.

Race EHRC review 'Race Right in the UK' July 2016 Inequalities re: housing, education and health. Poorer employment prospects and lower pay White; English/Welsh/Scottish/Northern 0.7 Asian/Asian British; Pakistani Irish/British 0.6 Mixed/Multiple Ethnic Groups; White and Asian ONS Data for White: Other White 0.6 Mixed/Multiple Ethnic Groups; Other Mixed Epping.xlsx Asian/Asian British: Indian 0.5 24 Asian/Asian British; Chinese 0.5 1.1 White; Irish Other Ethnic Group; Any Other Ethnic Group Black/African/Caribbean/Black British; 0.2 Mixed/Multiple Ethnic Groups; White and Black 1 African African 0.2 0.9Asian/Asian British; Other Asian Asian/Asian British; Bangladeshi Black/African/Caribbean/Black British; Black/African/Caribbean/Black British; Other 0.8 0.2 Caribbean 0.7 Mixed/Multiple Ethnic Groups; White and 0.1 White; Gypsy or Irish Traveller Black Caribbean 0.1 Other Ethnic Group; Arab **EFDC Tenant** Just over half of all tenants responded: -Census 2014 36% White Irish 5% Bangladeshi White - Other 87% 9% Asian - Other Black - African 3% Mixed - White and Black African 23% 11% Black - Caribbean 16% Mixed - Other 4% Black - Other 1% Chinese 7% Indian 9% Other ethnic group 3% Pakistani 3% Gypsy / Roma / Traveller background EFDC - HRA Within the Housing Service the ratio of staff is: -**Business** Around 60% are women **Plan 2016** Over 70% are over 45 years of age 10% are under 35 years of age **EFDC Tenant** Just over half of all tenants responded:-Census 2014 60.3% of tenants are female **Updating Overall Housing Need 2014 Migrant** EFDC has housed two Syrian families in the district so far. trends. Introductory information has been translated into Arabic. **EFDC** Site status Meets new Does not meet Unknown **Gypsy and** definition new definition **Traveller Gypsies and Travellers Accommoda** Public sites 0 3 0 tion 13 56 Private sites 15 **Assessment** Temporary sites 1 0 14 - Sept 2016 3 Unauthorised sites 3 0 **Sub Total** 17 18 73 publicregister-of-Travelling Show people licensed-Private Yards 1 1 8 gypsy-sites-Sub-total 1 8 may-2017 **Total** :standard-Local Plan Need 2011-2033 **Pitches** licence-No of Pitches required 2011-2033 38 pitches and 1 yard conditions-16 Completions for-grt-sites-Commitments 4 sept-2014 Remaining requirement to be identified 18 pitches and 1 yard **'Interim** The above was undertaken to provide a robust revised assessment of current and future need for **Briefing** Note' Gypsy, Traveller and Travelling Showpeople accommodation for the period of 2016-2033.

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EFDC - HRA Business Plan 2016

- Over 90% of the EFDC Housing service staff are white.
- Pg 11 Para 19 EFDC Council Housing Services compares the protected characteristics of those people who we have housed with those people on the Housing Register. This exercise showed that generally the 'protected characteristics' of housing applicants and those that have been given council accommodation are similar. No amendments to the Housing Allocations Scheme have been necessary to avoid discrimination.

Glasshouse-Industry-Report 2003

Report highlighted that seasonal / casual workers posts have been difficult to recruit to. As a result the horticultural industry has turned increasingly to employment agencies to source workers from abroad. Accommodation is a problem for employers of numbers of seasonal workers and local planning authorities. Most seasonal workers live in mobile homes or caravans on site.

Nursery Worker Accommodation – 2015 Survey

- EFDC 2015 survey identified 59 of 73 commercial growing sites identified had employees living in accommodation on site, on a permanent basis –incl. families and young children.
- Accommodation varied, worst conditions were mostly holiday style caravans due to risks of fire and explosion, electrocution, excess cold, insanitary drainage and poor drinking water.
- Overcrowding was a concern especially for young families.
- Nursery Worker Accommodation Task Group formed to address issues identified.

EFDC
2011+Census+Da

	All categories: Ethnic group	White: Gypsy or Irish Traveller
All categories	51,991	71
All tenure %	100%	0.1%
Owned or shared ownership: Total	37,771	33
Owned outright	18,070	25
Mortgage/loan/shared ownership	19,701	8
Social rented total	7,803	29
Social rented total %	100%	0.4%
Social rented from council (Local Authority)	6208	26
Social rented: Rented from council (LA) %	100%	0.4%
Social rent: Other social rented	1,595	3
Private rented or living rent free: Total	6,417	9
Private rented: Private landlord or letting agency	5,307	4
Private rented: Other private rented or living rent free	1,110	5

Sanctuary scheme

- Sanctuary Schemes helps families to stay in their homes if they have become victims of domestic violence or hate crime.
- EFDC Sanctuary Scheme is for people that live in the Epping Forest District. Set up by the Council's Housing Services, and group members of the Crime and Disorder Partnership.
- A safe room is created in the home, security measures are provided, internal fire doors, additional locks into the premises and firefighting equipment.
- The Scheme is available to homeowners, occupiers, council tenants, housing association tenants and people living in private rented accommodation.

Religion / belief



Of the EFDC Population

- Christian 61.8%
- Jewish − 3.2% •
- Other religion 0.3%

- Buddhist 0.3%
- Muslim 1.9%
- No religion –22.5%

- Hindu 1.4%
- Sikh 1%
- Do not wish to disclose 7.6%

The Crime Survey for England and Wales (CSEW)

The second most common motivating factor in hate crime incidents (2011/12 and 2012/13) was religion (70,000 incidents per year).

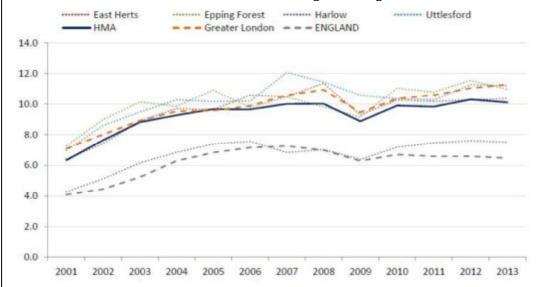
Home Office, Hate Crime, England and Wales 2014/15

In 2014/15, there were 52,528 hate crimes recorded by the police, an increase of 18% compared with the 44,471 hate crimes recorded in 2013/14, of which: 3,254 (6%) were religion hate crimes.

EEDC hote col	ima stata luna 2016
EFDC nate cri	ime stats June 2016
	EFDC hate crime statistics show some religiously motivated racial abuse hate crime in the district
Interfaith network	Focus is on the impact of Brexit on faiths including Muslim and Sikh; concerned about the increase in racially motivated hate crime. Asylum claims on religious grounds – concerned that the picture on the ground is not what is officially recognised.
Sexual orienta	ation and Gender reassignment
1236 Epping Forest Tenant Census 2014	
Safer-Places	 Independent domestic abuse charity supporting adults and children affected by domestic abuse. Offers advice and information, safe refuge accommodation, support, counselling; Specialist support for young people, the over 60's, the LGBT and the BMER community and for victims/survivors with substance misuse or mental health problems.
EFDC Tenant Census 2014	57%of all tenants responded stating - • 62.2% were heterosexual • 0.6% were gay or bisexual • 26% did not state their sexuality • 10% did not specify.
The Governme	ent Equalities Office (GEO)
	10% (4,622) of recorded hate crimes in 2013/14 were identified to be related to sexual orientation, with an additional 1% (555) related to the victim being transgender
http://www.o uthouseeast. org.uk/	Registered charity providing opportunities for LGBT (lesbian, gay, bisexual and transgender) people in Essex. Based in Colchester they offer help, support, advice and information. The Outhouse East is also a Hate Incident Reporting Centre (HIRC) so they will support the victim in report the hate crime (homophobic/transphobic) they have suffered.
EFDC Hate Crime	Data does not indicate that sexual orientation is a focus for hate crime in the district.
Inequality among lesbian gay bisexual and transgender groups in the UK - A review of evidence by Nathan Hudson- Sharp & Hilary Metcalf, National Institute of Economic and Social Research July 2016	The evidence base is insufficient to properly assess inequality and relative disadvantage by sexual orientation and gender identity Homophobic bullying in schools LGBT people are at greater risk of crime, particularly gay men, young people, and BME groups LGBT people's health is worse than heterosexual people LGBT people prefer and are more engaged with specialist rather than mainstream services Discrimination in the workplace LGBT familial rejection resulting in mental health problems and homelessness LGBT housing needs not addressed with homelessness services Improvement in acceptance of LGBT people in public positions however fear or abuse and expectation of discrimination are barriers to engagement in public and political life. Improvement in public acceptance of LGB people LGBT asylum seekers face additional barriers to securing housing employment and financial stability Young LGBT people face hostility in education, at home, and in wider society. Older LGBT people have more concerns that heterosexual people about moving into care homes, independence, mobility, health, housing, and mental health.

Other <u>Draft-OAHN-MoU-v8</u> Chapter-3-2016-08-18-OAN-update-based-on-2014-based-projections – August 2016 Page 8 - The revised OAN shows that the full objectively assessed need for housing 2011-33 was 46,058 but is now 54,608. In 2011 the census showed the following tenure: -Social rented - 7802 ONS Data for Private rented – 5472 Epping.xlsx Owned outright – 18069 Owned with a mortgage - 19699 Living rent free - 675 The housing register is assessed and housing need is reflected in the new build plans. HRA+Business+P The above includes the Repairs and Maintenance Business Plan 2016 - Sets the Council's EFDC - HRA standards, Policies, strategies and targets for all Responsive Repairs, Voids and Planned **Business** Plan 2016 Maintenance programmes. https://www. The report highlights the important of quality open spaces for sport and recreation as this has a gov.uk/gove positive effect on the health and well-being of communities. rnment/publ Deliver a wide choice of high quality homes, widen communities for home ownership and create ications/nati sustainable, inclusive and mixed communities local planning authorities should: onal-Plan for a mix of housing based on current and future demographic trends, market trend and planningthe needs of different groups in the community (including but not limited to those with policyprotected characteristics). framework--Identify the size, type, tenure and range of housing that is required in particular locations, 2 (NPPF) reflecting local demand. www.turn2us In June 2013 Department-of-Energy-and-Climate-Change-(DECC) published a 'framework for .org.uk/What-Energy and Climate Change'. Definition states that a household is said to be in fuel poverty if: is-fuelthey have required fuel costs that are above the average (the national median level); and poverty were they to spend that amount they would be left with a residual income below the official poverty line The Health Investing in the energy efficiency of housing can help stimulate the labour market and Impacts of economy, as well as creating opportunities for skilling up the construction workforce. **Cold Homes** Estimated half of homes in sparsely populated English communities have an energy and Fuel efficiency rating of below SAP30, (considered a significant health hazard). In 2006, 21% in **Poverty** rural areas were in fuel poverty compared with 11% in suburban and 10% in urban areas. leaflet Rural homes are likely to be detached, larger in size than urban homes, more difficult and (2011)more expensive to heat, or to make more energy efficient. Access to mains gas is rare (about 5 or 10 miles from an urban area). Rural homes pay more for their fuel leading to a high percentage in fuel poverty. Heating by electric, oil or solid fuel, tends to be more expensive and less efficient. Many rural homes are older buildings. Likely to have solid walls (almost all homes built before 1919 are solid walled), which are generally less well-insulated than cavity walls (as can be found in nearly all homes built after 1945). Over 60% of homes in urban areas and rural towns are cavity walled and on mains gas, 32% in villages and 21% in hamlets. These factors mean that it is on average more difficult and more expensive to improve the energy efficiency of a rural home and need to be considered when developing policies and interventions aimed at reducing fuel poverty. **Draft-local-**None of the areas within the District ranked within the 10% most deprived nationally plan Parts of Loughton Alderton and Waltham Abbey Paternoster wards were ranked within the 20% most deprived (2nd decile), with parts of Grange Hill, Waltham Abbey North East and Waltham Abbey High Beach wards in the 30% most deprived (3rd decile). Housing affordability in the Pistrict has been a significant problem in more recent times. Page 22

- Areas situated on the border of Greater London, are attractive to city commuters.
- 2001-2013 housing was less affordable in the District than in England as a whole, and broadly comparable to that in East Herts District, Uttlesford District and Greater London as a whole
- Ratio of Lower Quartile House Price to Lower Quartile Earnings 2001-2013 Source – West Essex and East Hertfordshire Strategic Housing Market Assessment 2015



Enjoy good health wellb eing - Essex County Council (2010)

Fuel Pov	erty in Local Authorities				
LA Code	LA Name	English region	All Households	Fuel Poor Households	Percent Fuel Poor
22UB	Basildon	East of England	72,359	4,997	6.9%
22UC	Braintree	East of England	60,447	5,520	9.1%
22UD	Brentwood	East of England	30,708	3,144	10.2%
22UE	Castle Point	East of England	36,789	3,493	9.5%
22UF	Chelmsford	East of England	70.896	6,347	9.0%
22UG	Colchester	East of England	73,275	7,666	10.5%
22UH	Epping Forest	East of England	53,235	5,257	9.9%
22UJ	Harlow	East of England	35,191	2,196	6.2%
22UK	Maldon	East of England	25,740	2,393	9.3%
22UL	Rochford	East of England	33.675	3,195	9.5%
22UN	Tendring	East of England	65,180	7,777	11.9%
22UQ	Uttlesford	East of England	31,139	3,441	11.1%

The data in the above table with the EFDC Home Energy Conservation report 2017 table (below) it shows the number of households in the district has increased 224 but the number of households in fuel poverty has reduced from approx. 5,257 to approx. 4,185 (2.1%)

2017 EFDC Report	Epping Forest	53,459	4,185	7.8%
2010 Essex County Council Report	Epping Forest	53,235	5,257	9.9%

EFDC Home Energy Conservatio n Act 1995 progress report 2017 Number of fuel poor households and residents in Essex

County / LA	Est no. of households	Est no. of fuel poor	%
Essex	597510	44726	7.5
Basildon	74711	4725	6.3
Braintree	62687	5237	8.4
Brentwood	31462	2196	7.0
Castle Point	37438	2382	6.4
Chelmsford	71553	4906	6.9
Colchester	73643	5766	7.8
Epping Forest	<mark>53459</mark>	<mark>4185</mark>	<mark>7.8</mark>
Harlow	35561	2531	7.1
Maldon	26517	2422	9.1
Rochford	34475	2128	6.2
Tendring	63823	5128	8.0
Uttlesford	32181	3120	9.7

- Epping Forest District residents are experiencing more fuel poverty than across Essex.
- The Private Sector House Condition Survey of 2011 included ward level data for fuel poverty

by this is no longer current. The Council is: -

- o Currently adding data to the GIS to accurately identify where fuel poverty exists; and
- Commissioned a housing stock analysis project that will identify broader areas where fuel poverty is likely to exist and recommend solutions.

EFDC plans to develop a strategic approach to the alleviation of fuel poverty by the end of 2017, once the above data is collated and additional information is provided by the Government. Currently the Council provides help to residents in fuel poverty, or those on low incomes before they become fuel poor, by: -

- Providing small grants (under £500) to residents in the private sector on low incomes for lowcost energy efficiency interventions;
- Small Works / Decent Homes Repayable Assistance to eligible residents in the private sector whose homes that fail the Decent Homes Standard;
- All the EFDC officers in the Private Sector Housing teams are trained to provide advice on heating, insulation and energy efficiency;
- Bringing the condition of as many as possible of our Council-owned residential properties up to a standard in excess of the Decent Homes Standard in order to avoid high energy use;
- Providing budgeting support and advice through specialty trained officers to help those who
 are concerned about paying for their fuel, or other budgeting and money matters.
- The EFDC area covers an area of approximately 130 square miles.
- 2011 census population for district 124,660 people living in close to 54,400 dwellings.
- Approx 54,400 homes, around 6,500 are managed and maintained by the Council
- Private Sector Housing (owner-occupied and privately rented properties) are approx. 82% and 3% respectively (Total 85% of the Districts Housing stock);
- 2011 Private House Condition Survey indicated that the SAP rating of owner=occupied properties was 54 and privately rented was 51.
- 70% of the Council owned stock of social housing (6,500 properties 12% of total housing stock) had surveys carried out on them and it found that the average SAP rating was 71. When properties become available an Energy Performance Certificate (EPC) is produced.
- EFDC plans to improve SAP ratings: -

Private Sector House Condition Survey 2011

- EFDC District has an ageing population with a higher rate of heads of household aged 65 and over than that found nationally (30.0% compared with 25.1%). This will potentially place increasing demands on the authority for adaptations and works to allow frail and vulnerable occupiers to live in their own homes, with the current potential cost for Disabled Facilities Grant being estimated at £3.6 million.
- Given the findings in relation to energy efficiency, vulnerable occupiers and Fuel Poverty, a logical approach to private sector housing assistance and enforcement would include a focus on energy efficiency.
- The survey found that in the District there were an estimated 1,020 long-term vacant dwellings. This represents a wasted resource, which the authority is tackling the Private Lease Agreements Converting Empties (PLACE) initiative.

Table 8.3 Thermal Comfort failure by social characteristics

Group	Thermal Comfort Failure		
Income under 10k	14.7%		
On Benefit	17.1%		
Under 25	31.9%		
65 and Over	9.6%		
65 and over on benefit	12.3%		
Resident with disability	13.2%		
Percentage for Whole District	12.4%		

Source: 2011 House Condition Survey

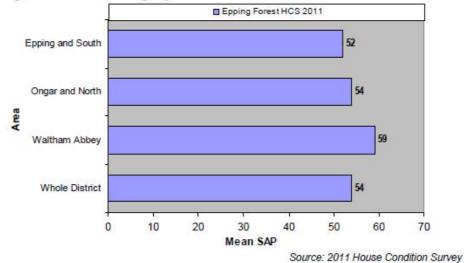
12.4% or 5,560 properties in the District failed the Thermal Comfor Criterion of the Decent Homes Standard compared with 10.9% nationally.

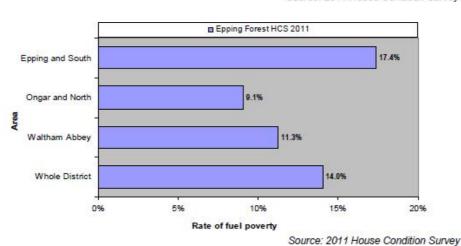
Key findings from the House Condition Survey

Characteristic	Owner occupied	Privately rented	All private sector stock	England
Dwellings	36,920	7,750	44,670	
Per cent of stock ¹	70%	15%	85%	83.0%
Non-Decent	7,840	3,850	11,690	
As a % of each tenure	21.2%	49.7%	26.2.%	31.5%
Vulnerable in Decent Homes ²	4,280	1,320	5,600	
% vulnerable households in Decent Homes	75.2%	49.1%	66.8%	77.3%
Category 1 Hazard	4,130	1,880	6,010	
As a % of each tenure	11.2%	24.3%	13.5%	22.0%
In Fuel Poverty	5,700	310	6,010	
As a % of each tenure	15.9%	4.4%	14.0%	17.9%
Mean SAP³	54	51	54	51
Residents aged 60+	11,960	890	12,850	
As a % of each tenure 4	33.5%	12.6%	30.0%	25.1%
Households in receipt of benefit	5,690	2,690	8,380	
As a % of each tenure 4	16.0%	38.0%	20.0%	20.0%

- Percentages given as a proportion of total housing stock, the remaining 15% is all social housing, which was not surveyed as part of this study
 Refers to households in receipt of an income or disability benefit, as defined under former Public Service Agreement 7 objectives
- SAP is the government's Standard Assessment Procedure for rating energy efficiency on a scale of 1 (poor) to 100 (excellent)
- 4. As a percentage of occupied dwellings, not all dwellings

Mean SAP ratings by sub area





Housing Service Strategy on Energy Efficiency -2015 Provision of energy efficiency advice and measures in residential properties across the district;

- a) Improving SAP ratings: Currently the number of properties in the lowest SAP Bands is:
 - Band G = 0 properties
 - Band F = 6 properties
 - Band E = 393 properties

Over the next two years, the Council aims to undertake energy efficiency measures on low SAP properties such that there:

- Are no Council properties with inefficient gas boilers in SAP bands E, F and G;
- Is an annual reduction in properties in SAP band D; and,
- Is an increase in the number of properties in SAP bands C and B.

Between 2014 and 2017 percentage of properties in bands D, E, F and G have been reduced by:

- Band G 100%
- Band F 92%
- Band E 31%
- Band D 16%

and properties in bands C and B have increased as follows:

- Band C 73%
- Band B 58%
- b) Installing energy efficient boilers
 - Currently the total number of properties in our own housing stock with inefficient boilers is:
 - SEDBUK Band G = 85 properties
 - SEDBUK Band F = 56 properties
 - SEDBUK Band E = 298 properties

3.1 What does the information tell you about those groups identified?

The Epping Forest District has an increasing population, especially an older healthier generation.

Increase in the number of types of accommodation required. Adaptable accessible dwellings are required to suit the owners requirements: disability and age related disabilities.

Fuel poverty can be an issue for those with protected characteristics especially those based in a rural area as this can have a detrimental impact on both physical and mental wellbeing.

The strategy does not disproportionally affect any group more than another. It aims to have a positive impact on households/individuals from protected characteristic groups identified above, especially those who may have particular issues accessing and maintaining tenancies/homes. All opportunities to promote equality have been taken.

Have you consulted or involved those groups that are likely to be affected by the policy or decision you want to implement? If so, what were their views and how have their views influenced your decision?

Consultation of the Draft Local Plan has taken place. The outcome of the consultation is due to be published in Spring 2018.

The strategy aims to encourage private landlords to offer greater security and stability for tenants and families.

3.3 If you have not consulted or engaged with communities that are likely to be affected by the policy or decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary:

Section 4: Impact of policy or decision

Use this section to assess any potential impact on equality groups based on what you now know.

Description of impact	Nature of impact Positive, neutral, adverse (explain why)	Extent of impact Low, medium, high (use L, M or H)
Age	Positive:	М
Disability	 Increase dwellings numbers across the district. New builds will be built to Lifetime Homes Standard so will be adaptable to suit occupier's needs. Better quality housing (Decent Homes Standard) has a beneficial impact for physical and mental well-being. Reduces the chance of falling into 'fuel poverty'. Colder homes have a detrimental effect on a family's health and development. EFDC Careline enables independent living for longer. Adverse: Those on low incomes may not be able to afford new affordable rents. Temporary access restrictions and noise while homes are under development but will include methods to manage works to reduce impact. 	M
Gender	Neutral	L
Gender reassignment	EFDC works with Sanctuary helping those of domestic abuse or hate crime.	L
Marriage/civil partnership	Neutral – the Housing Strategy would not affect this group	L
Pregnancy/maternity	Positive: Council tenants can downsize enabling larger families to be housed. Also enables families to stay in the community and provide support. The strategy aims to encourage private landlords to offer greater security and stability for tenants and families	L
Race	 Positive: Improving services and housing within the community enables people from different backgrounds to form relationships with one another and improve social interaction. Breaks down barriers. Ethnic minority groups – improving Page 27 	L

	standards of nursery worker accommodation /site licensing. Gypsies and travellers (site licence conditions variations take account of cultural and lifestyle differences).	
Religion/belief	Neutral – the Housing Strategy would not affect this group.	L
Sexual orientation	Neutral – the Housing Strategy would not affect this group.	L

Section 5: Conclusion					
		Tick Yes/No as appropriate			
5.1	Does the EqIA in	No 🗌			
	Section 4 indicate that the policy or decision would have a medium or high adverse impact on one or more equality groups?	Yes ⊠	If 'YES', use the action plan at Section 6 to describe the adverse impacts and what mitigating actions you could put in place.		

Section 6: Action plan to address and monitor adverse impacts

What are the potential adverse impacts?	What are the mitigating actions?	Date they will be achieved.
Temporary access restrictions and construction noise during council house-building.	To communicate with residents through-out the building process	Ongoing
Affordable rent – the most significantly impacted will tend to be those with lower incomes. They will be unlikely to afford the new affordable rent.	Affordable rent prices will be made clear to tenants when properties are advertised.	Ongoing

Section 7: Sign off

I confirm that this initial analysis has been completed appropriately. (A typed signature is sufficient.)

Signature of Head of Service: Alan Hall	Date: 16 th June 2017
Signature of person completing the EqIA: Mary Masterson	

Advice

Keep your director informed of all equality & diversity issues. We recommend that you forward a copy of every EqIA you undertake to the director responsible for the service area. Retain a copy of this EqIA for your records. If this EqIA relates to a continuing project, ensure this document is kept under review and updated, eg after a consultation has been undertaken.





Housing Strategy

2017 - 2022

innovation

trust consultation

affordable housing

one team

analysis

focus

Our Housing Vision

Epping Forest will be a place that has safe, decent and good quality housing, of an appropriate mix of sizes, types and tenure, that meets the local needs of those who want to live in the District

need

strategy

homes

custome

communication performance success

local plan future

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Chapter 1

Introduction

Background

This Housing Strategy assesses the District's current and future housing needs, and sets out the Council's approach to meeting those needs. It takes account of both national and local priorities and the links between other Council and non-Council strategies that influence, and are influenced by, the Housing Strategy. The Strategy sets out the overall Vision for housing in the District, the key housing objectives and the aims and objectives relating to individual housing issues. It also provides a Key Action Plan for the first year of the Strategy.

Every attempt has been made to ensure that the Housing Strategy is not a "technical document", and that it meets the needs of the widest possible audience, including tenants and private occupiers, housing organisations, Council members and other interested parties. Documents referred to in the on-line version of this Strategy can be accessed through links that are shown in dark blue text.

The Housing Strategy is a dynamic document, which will be continually developed and reviewed. In particular, the Key Action Plan will be reviewed and updated on an annual basis. Chapter 12 gives more details about reviewing these.

The Epping Forest District

The Epping Forest District covers urban and rural areas of 131 square miles, including around twelve towns and larger villages, ranging in population size of between 2,000 and 30,000, currently totalling around 131,500 people. It is an attractive Green Belt area, with good road and rail links to the capital, so it is popular with commuters. The southern parts of the District are on the borders of Greater London and are more populous and urbanised.

The total number of dwellings in the District was around 55,630 in April 2017. Of these properties, around 85% are in the private sector. Around 6,340 properties (11%) are owned by the Council, which is by far the main social landlord in the District. The number of housing association properties is steadily increasing, with around 3% of the District's dwellings now owned by housing associations.

Formal adoption of the Housing Strategy

This Housing Strategy was adopted at a meeting of the Council's Cabinet on 11th July 2017, following detailed scrutiny by the Council's Communities Select Committee.

Period of Housing Strategy

The Strategy sets out the District's housing plans for the medium term (i.e. over the next 5 years). However, these plans have been formulated with regard to the housing objectives for the long term which, in some cases, can span a period of 30 years.

The Housing Strategy will be updated in five years' time, during 2022, unless there are significant changes required to the Council's strategic approach. The Key Action Plan will be updated annually.

Chapter 2

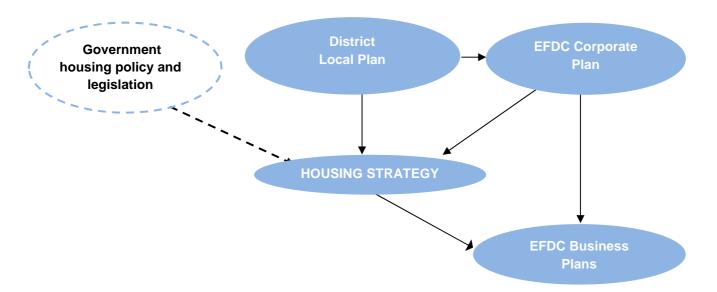
Strategic aims and priorities

Introduction

This Housing Strategy is only one of a range of complementary and inter-related strategic documents and plans produced by the Council. It is also influenced by a number of strategies produced by other agencies. In formulating the Housing Strategy, careful regard has been given to relevant corporate objectives and strategies. This section of the Strategy sets out where it sits in relation to other strategies produced by the Council and the Council's strategic housing aims and objectives.

The Council's strategic approach to housing

The hierarchy of the Council's strategic approach to housing can be summarised in the following chart:



EFDC Corporate Plan

The Council's prime strategic document, that sets out the Council's priorities for the planning and delivery of services over a five-year period (currently 2015-2020).

District Local Plan

The Council's prime town planning document that sets out all the Council's town planning policies and land allocations. The current Local Plan is in the process of being updated. A new Draft Local Plan was published for consultation in October 2016 and, following analysis and consideration of the comments received, a Pre-Submission Local Plan will be produced in Spring 2018.

Government housing policy and legislation

Clearly, the Council must comply with legislation - which is often updated and influences and affects the Council's delivery of its Housing Strategy. Similarly, Government housing policy (which often results in legislation) has an influence on the Housing Strategy as well. The Government's latest housing policy was set out in its

Housing White Paper Fixing our broken housing market published in February 2017, which has influenced this Housing Strategy.

EFDC Business Plans Each of the Council's Directorates produces an annual Business Plan, in support of the EFDC Corporate Plan, setting out the key actions and resource requirements for the forthcoming year.

Corporate Vision and Objectives

The Council's Corporate Plan 2015 – 2020 recognises that the Epping Forest District is full of character and wants it to continue to be a great place to live, work, play, study and do business.

The Corporate Plan sets out the Council's Vision in 10 separate statements. The four statements that are directly related to this Housing Strategy are as follows:

- We want to make best use of existing infrastructure to meet the District's needs for development in the most sustainable locations with the least possible impact on our natural and historic environment;
- We want to keep the individual character, identity and separateness of our towns and villages by protecting the Green Belt;
- We want new homes to meet the needs of local people while also supporting economic development. The scale of development should be appropriate to the size of our towns and villages, bringing vitality and other benefits to our communities; and
- We want to build relationships with our partners to develop initiatives and service improvements with reduced costs, greater efficiency and better value for money.

The Draft Local Plan's Vision for the District

Chapter 3 of this Housing Strategy sets out the Council's approach to formulating its Local Plan for the future. The Local Plan has a Vision relating to the sort of place that the District will be by 2033, through 10 statements. Five of these are directly related to this Housing Strategy. These are that, by 2033, the District will be a place where:

- Residents continue to enjoy a good quality of life;
- New homes of an appropriate mix of sizes, types and tenures to meet local needs have been provided and well integrated communities created;
- Development respects the attributes of the different towns and villages
- Development needs will be met in the most sustainable locations; and
- Significant residential development will be located near Harlow to support the economic regeneration of the town.

Vision for the Housing Strategy and the Key Housing Objectives

Epping Forest will be a place that has safe, decent and good quality housing, of an appropriate mix of sizes, types and tenure, that meet the local needs of those who want to live in the District.

This Housing Strategy has nine Key Housing Objectives. These are:

- To ensure that plans are in place and that sufficient land is allocated to meet the assessed housing need for the District;
- To make provision for objectively assessed market and affordable housing needs within the District, to the extent that this is compatible with national planning policy;
- To ensure that new homes provide an appropriate mix of sizes, types, forms and tenures to meet local needs and to create balanced, mixed and well-integrated communities;
- To ensure that the growth in the number of homes in the District is properly planned, along with adequate infrastructures such as roads, health facilities and schools (i.e sustainable);
- To make affordable housing available both for rent and for low cost home ownership in rural and urban locations, for local people who want to live in the District;
- To ensure that people with special needs are able to live in suitable accommodation with appropriate levels of support;
- To quickly accommodate homeless people in suitable, permanent accommodation;
- To make provision for the identified needs of the Travellers and Travelling Showpeople;
 and
- To ensure that all homes in the District, in both the public and private sector, are in a decent condition

Individual Housing Objectives

Individual housing objectives relating to the needs and demands of different sectors of the community are given throughout this Housing Strategy.

Chapter 3

The Council's Local Plan

Purpose of a Local Plan

Every local planning authority is expected to prepare and regularly update a Local Plan. A Local Plan is normally a district-wide plan which sets out the long-term vision, objectives and policies to guide the future development of an area. It also provides the strategic context within which any Neighbourhood Plans should be developed.

Local plans are designed to identify and protect areas of value, such as areas of nature conservation and recreational importance (e.g. Epping Forest and the Lee Valley Regional Park), as well as the Metropolitan Green Belt. They are also intended to guide where future development (including for residential, employment and retail purposes) should be focused. In addition, they include policies which are used to assess planning applications as they come forward, to ensure that high quality development is delivered, and that it is supported by the infrastructure needed.

Timeframe for EFDC's Local Plan

The Council's current Local Plan was adopted in 1998, although some parts were subsequently replaced in 2006 by the Council's adopted Local Plan Alterations. Most of these policies are 'saved' although, since the publication of the National Planning Policy Framework (NPPF) by the Government in 2012, some are now considered to be out of date and cannot be used.

To ensure that the District has an up-to-date and robust planning policy context against which to bring forward development, the Council is now preparing a new Local Plan for the period 2011 to 2033. This will set out the level and distribution of development, including for new homes and jobs.

So far the Council has undertaken three stages of public consultation, as follows:

- Community Visioning (November 2010 to January 2011)
- Issues and Options 'Community Choices' (July to October 2012)
- Draft Local Plan (October to December 2016)

Once all the comments received during the Draft Local Plan consultation period have been reviewed, amendments will be made, where appropriate, to the Plan. The Council will then publish a 'Pre-Submission' Local Plan and seek representations on its 'soundness'. The Plan, together with the representations received from this stage of consultation, will then be submitted to the Secretary of State for Communities and Local Government and will be independently examined.

It is anticipated that the new Local Plan will be adopted in 2019, subject to approval by the Secretary of State. Once the new Local Plan is adopted, it will be the statutory development plan for the District, and will be used to decide planning applications. As the Local Plan progresses, the Council will be able to give increasing 'weight' to its policies when determining planning applications.

Housing in the Draft Local Plan 2016

A key element of the Local Plan is to ensure that sufficient housing will be provided to support the needs of the District's existing and future population and its businesses over the Local Plan period (up to 2033). Making sure that people have access to high quality housing, whatever their financial situation, is key to ensuring the long-term quality of their lives.

It is also vital that there are sufficient workers to support the District's economy, so that businesses know that there is a locally-based workforce with the right skills to support their business needs, to make them feel confident in investing within the District.

National policy places a duty on local planning authorities to achieve delivery of a wide choice of high quality homes and to boost significantly the supply of housing. This is not just about making sure that the numbers of homes needed are provided, but that they are also of the right type, size and tenure. The Council, through the Local Plan, and the subsequent site specific planning decisions that it makes, will seek to support the delivery of a wide choice of high quality homes which create sustainable, inclusive and mixed communities. This is in line with the NPPF which says that, in order to achieve this, local planning authorities should:

- Plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);
- Identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and
- Where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example, to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.

Self and Custom Build

Under the Self Build and Custom Housebuilding Act 2015, local authorities are required to hold a register of people who want to acquire serviced plots of land in their area for self and custom housebuilding. The Housing and Planning Act 2016 and subsequent Regulations have further strengthened the role and the requirements for local authorities, and require them to permission sufficient land suitable for self and custom building housing to meet the demand on their Self and Custom Build Register within three years.

The Council has received two allocations of funding from the Government, which it will be using to develop, promote and implement the requirements for self and custom build housing, as follows:

Community Housing Fund – The Council has been allocated around £32,200 to support
community-led housing developments. The Council is working in partnership with
neighbouring East Herts, Uttlesford and Harlow Councils to pool the funding they have
also received, making a total of just over £100,000, to take forward a joint project across
the HMA.

The project will look at all aspects of community-led housing, including self and custom build and Community Land Trusts, to identify existing and new participants for these models of housing delivery. The research will include a series of events and will provide information to inform interested people about the potential for community-led schemes

• Self and Custom Build Fund - The Government has recognised that the requirements to implement self and custom build create a new burden on local authorities and has therefore made additional funding available. The Council is receiving around £96,000 over a 4-year between 2016/17 and 2019/20. The Council is therefore utilising this funding to appoint a new Affordable Housing Officer, for 3 years, to provide the required capacity to undertake this additional work – which will be reviewed towards the end of the 3-year period to assess the staffing resources required beyond this period.

Chapter 4

Strategic Housing Market Assessment

Purpose of a Strategic Housing Market Assessment (SHMA)

To have a clear understanding of the number and type of homes needed, the NPPF says that local planning authorities should prepare a Strategic Housing Market Assessment (SHMA). A SHMA is a technical and objective piece of analysis to help understand the likely future housing needs of an area. It should not be influenced by current physical or policy constraints, or the capacity that may or may not exist within an area to accommodate the homes needed. It provides the 'starting point' by which a local authority, or group of authorities, can understand the likely level and type of new homes that they should be seeking to provide through their Local Plans. This is known as the Objectively Assessed Housing Need (OAHN).

The Housing Market Area (HMA)

Government policy requires that a SHMA should assess housing need in an effective Housing Market Area (HMA). An HMA is '.... a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work.'

HMAs are defined by considering a range of matters including dwelling prices, where people choose to move to, and travel to work patterns. In practice, this means that HMAs very often cross administrative boundaries, and local planning authorities are required to work with all the other authorities within their Housing Market Area, under the 'Duty to Co-operate', including, where appropriate, through the preparation of a joint SHMA.

Technical analysis of the data on the matters set out above has identified that the Epping Forest District sits within a Housing Market Area which also includes East Hertfordshire District, Harlow District and Uttlesford District. The four authorities, together with Essex County Council and Hertfordshire County Council, have a long history of joint working on strategic planning issues, not least on assessing housing need and planning for future growth. In response to the 'Duty to Co-operate', in October 2014 the councils in the HMA established the Co-operation for Sustainable Development Member Board (the "Co-Op Board") to take a strategic approach to the delivery of housing and economic needs across the area.

Role of the SHMA in setting a Local Plan Housing Target

It is important to recognise that the information from the SHMA should not be considered in isolation, as it forms part of a wider Local Plan evidence base to inform the development of housing and planning policies. The SHMA does not seek to determine rigid policy conclusions, but instead provides a key component of the evidence base required to develop a sound framework for the future planning of an area.

It is also important to recognise that the OAHN is not the Local Plan housing target. The OAHN is tested against a range of considerations to determine whether the OAHN can be accommodated within the HMA and within individual districts. This includes considering whether there is the physical capacity to accommodate the OAHN or whether to do so would cause harm which is contrary to the principles and policies of the NPPF. This further testing

is used to then establish what the Local Plan housing target should be. This is why the OAHN is often described as the 'starting point' to determining a Local Plan Housing Target.

The 2015 SHMA

The most recent comprehensive West Essex/East Hertfordshire SHMA, produced by Opinion Research Services, was published in September 2015. It used a wide range of data, including the Office for National Statistics' Sub-National Population Projections (district-level), the Department for Communities and Local Government's Household Projections, the councils' own data on past housing completions, the councils' Housing Register data and the level of existing affordable housing stock.

The revised SHMA, having identified the extent of the geographic area to be assessed (the HMA), then undertook a detailed analysis of a range of information in order to establish an OAHN for both the HMA and for the individual local authorities within it.

The analysis led to the identification of the OAHN for both the HMA and for the individual local authorities within it. The SHMA also gives a breakdown of housing need by tenure and dwelling size/type, as shown in Table 4.1 It is important to recognise that the housing apportionment set out below for the Epping Forest District relates to the District as a whole, rather than being site specific. The mix of housing on individual sites will need to reflect the individual characteristics and location of each site, the existing housing stock in the area and viability. In addition, the Council would expect the affordable housing mix on individual sites to reflect the market housing mix (in terms of size of units), although local evidence may indicate that on some sites a different approach needs to be taken.

Table 4.1 - Market and affordable housing mix by local authority (SHMA, 2015)

OAHN 2011	- 2033	East Herts DC	Epping Forest DC	Harlow DC	Uttlesford DC	HMA Total
Market Flat	1 bed flat	710	430	170	140	1,400
Market Flat	2+ bed flat	810	450	30	80	1,400
	2 bed house	1,510	1,020	610	690	3,800
Market	3 bed house	5,640	4,090	1,690	4,290	15,700
House	4 bed house	2,740	1,580	50	3,110	7,500
	5+ bed house	770	510	-	1,410	2,700
Market total *		12,200	8,100	2,500	9,700	32,500
Affordable	1 bed flat	820	570	100	320	1,800
Flat	2+ bed flat	470	450	550	330	1,800
	2 bed house	1,210	710	940	850	3,700
Affordable House	3 bed house	1,410	1,180	1,400	1,060	5,050
110000	4+ bed house	310	310	360	220	1,000
Affordable total *		4,200	3,200	3,400	2,800	13,600
Grand total *		16,400	11,300	5,900	12,500	46,100

^{*} figures may not total due to rounding

The SHMA also gives a breakdown of the likely affordable housing need by tenure and dwelling size/type, as shown in Table 4.2 below.

Table 4.2 - Affordable housing breakdown by local authority (SHMA, 2015)

Affordable 20°	11 - 2033	East Herts DC	Epping Forest DC	Harlow DC	Uttlesford DC	HMA Total
Affordable	1 bed flat	720	520	90	290	1,600
Rent Flat	2+ bed flat	400	350	460	230	1,400
A.(()	2 bed house	1,020	550	790	580	2,900
Affordable Rent House	3 bed house	1,130	950	1,200	720	4,000
	4 bed house	270	280	320	180	1,000
Affordable rent	total *	3,500	2,600	2,900	2,000	11,000
Intermediate	1 bed flat	100	50	10	30	200
Affordable Flat	2+ bed flat	70	100	90	100	400
Intermediate	2 bed house	190	160	150	270	800
Affordable	3 bed house	280	230	200	340	1,000
House	4+ bed house	40	30	40	40	100
Intermediate af	fordable total *	700	600	500	800	2,600
Grand total *		4,200	3,200	3,400	2,800	13,600

^{*} figures may not total due to rounding

Emerging OAHN data 2016

Following the publication of the 2015 SHMA, the Office of National Statistics and Department for Communities and Local Government published updated population and household projections in July 2016. The West Essex/East Herts authorities commissioned consultants Opinion Research Services to undertake some checking of the Objectively Assessed Housing Need in the light of the new projections, which resulted in the "Note on updating the Overall Housing Need based on 2014 based projections for West Essex and East Herts (August 2016)".

It is important to recognise that the "Update Note" does not represent a full SHMA refresh, but rather an initial assessment of the impact of the updated projections on OAHN. It does not contain any investigation of the figures in detail, or any breakdown by tenure and dwelling size/type. This will be done when the SHMA is next formally updated by the West Essex/East Herts authorities.

The assessment detailed in the Update Note has indicated that the Objectively Assessed Housing Need for the HMA may now likely be some 54,600 dwellings (rather than 46,100 as listed in Table 4.1). Table 4.3 shows the split of this between the four authorities.

Table 4.3 – OAHN comparison

	East Herts DC	Epping Forest DC	Harlow DC	Uttlesford DC	HMA Total
Indicative OAHN from the 'Note on updating the Overall Housing Need'	19,400	13,300	7,800	14,100	54,600
OAHN from the SHMA 2015	16,400	11,300	5,900	12,500	46,100

In light of this new information, the West Essex/East Herts authorities commissioned consultants AECOM to assess the potential to increase the level of housing to be delivered across the Housing Market Area. This demonstrated that the level of infrastructure and environmental constraints are such that to provide for the full OAHN based on the July 2016 figures would result in Local Plans which did not fully accord with other policies set out in the NPPF.

The assessment has, however, shown that the HMA has the potential to accommodate around 51,100 homes over the period 2011 - 2033. Further detail on this assessment can be found in the Sustainability Appraisal of Strategic OAHN Spatial Options for the West Essex and East Herts Housing Market Area (August 2016).

As a result of this joint work, in March 2017, the West Essex/East Herts authorities signed a Memorandum of Understanding (MoU) on the Distribution of OAHN up to 2033. Under the MoU, it is proposed that the OAHN will be apportioned in way set out in Table 4.4.

Table 4.4 – Proposed apportionment of OAHN within the MoU (March 2017)

Local authority	Net new dwellings 2011 - 2033
East Hertfordshire District Council	18,000
Epping Forest District Council	11,400
Harlow District Council	9,200
Uttlesford District Council	12,500
Total across the HMA	51,100
'of which the area in and around Harlow* will provide'	16,100

^{* &#}x27;In and around Harlow' refers to Harlow town as well as around Harlow in adjoining districts

The figure of 11,400 net new dwellings was used within the Draft Local Plan 2016 consultation as the housing requirement for Epping Forest District for the period 2011 – 2033.

It should be noted that the Government's Housing White Paper, Fixing our broken housing market, has indicated that the Government will be preparing a standardised methodology for the calculation of OAHN. When this is published, the four authorities in the HMA will update the SHMA.

Chapter 5

Affordable Housing

Aim

To maximise and increase the amount of good quality affordable housing in the District, in the form of affordable rented housing and low cost home ownership, to meet the assessed level of need for affordable homes.

Objectives

- a) Work with housing associations and developers to increase the number of affordable homes within the District:
- b) On developments which provide for 11 or more homes (or on land in excess of 1,000sqm gross floor space), generally seek:
 - A minimum of 40% of the homes as affordable housing through the use of agreements under Section 106 of the Town and Country Planning Act 1990, with the affordable housing mix on such sites reflecting the private housing mix; and
 - Up to 25% of the affordable homes as shared ownership homes (not as "starter homes"), to assist first time buyers to gain access to home ownership and to meet the National Planning Policy Framework's requirement for the provision of affordable home ownership properties;
- c) In order for shared ownership homes to be affordable to as many people as possible, ensure that:
 - Initial equity sales to individual applicants for shared ownership properties are no less than 20% and no more than 75% of the open market value of the property;

- For development appraisals undertaken bv housing associations for the purchase or development of affordable housing, the assumption used for the average initial equity shares to be sold to applicants across all of the shared ownership properties on the development is no more than 35%, and is reflected in offers made to landowners and developers:
- Shared owners are able to purchase additional equity shares (staircase) up to full 100% ownership, except for rural housing schemes for which a maximum of 80% equity can be purchased under current Homes and Communities Agency policy; and
- The initial rent charged for the equity retained by the housing association is equivalent to no more than 2% of the value of the unsold equity per annum, with subsequent rent increases determined in accordance with the relevant housing association's rent setting policy;
- d) In exceptional circumstances, where the Council considers that the provision of on-site affordable housing provision would be inappropriate, seek the off-site provision of affordable

housing, equivalent to at least 40% of the combined total number of properties developed on-site and offsite, or the provision of a financial contribution equivalent to the amount of subsidy the developer would have needed to contribute to the affordable housing, if it was provided on-site;

- e) Seek to ensure that housing associations and other housing providers charge affordable rents at no more than the level of the relevant Local Housing Allowance for the locality;
- f) Ensure that developers comply with the Council's latest Guidance Note to **Planning Applicants** on Submission of Viability and Financial Appraisals for Affordable Housing and robustly assess and validate Viability Appraisals submitted for developments where developers assert that it is not possible to meet the Council's affordable housing requirements, in

- order to ensure that as much affordable housing is obtained as viably possible;
- g) Work with parish councils to increase the amount of affordable housing in rural areas, by granting planning permission for small scale affordable housing schemes on appropriate sites within the Green Belt, adjacent to rural settlements, as an exception to normal planning policy, where there is a demonstrable local housing need.
- h) Through the Council's Scheme of Preferred Housing Association Partners, encourage partnerships with housing associations already operating within the District, rather than with new housing associations.
- Seek to ensure that all new affordable homes meet or exceed the minimum internal space standards of the Government's Nationally Described Space Standards.

Key issues

Affordable housing need

Chapter 4 explains and summarises the latest Strategic Housing Market Assessment (SHMA), which was undertaken in 2015. The SHMA identified that a total of 3,220 new affordable homes are required to be provided in the District over the 22-year period between 2011 and 2033. The assessed need for the Epping Forest District by tenure, property type and size is as follows:

Table 5.1 – Assessed housing need

Tenure	Туре	Size	Numbers		%	
	Flats	1 Bed	520	870		
		2 Bed +	350	670	2,650	83%
Affordable Rent		2 Bed	550	1780		
Houses	Houses	3 Bed	950			
		4 Bed +	280			

	Flats	1 Bed	50	150		
		2 Bed +	100	150		
Intermediate Housing		2 Bed	160		570	17%
riodollig	Houses	3 Bed	230	420		
		4 Bed +	30			
		Total		3,220		

The above assessment equates to an average of 146 new affordable homes being required to be provided every year for the 22-year period of the Local Plan.

Recent affordable housing completions

Due to the small number of housing sites brought forward in recent years, resulting from the early achievement of the previous Structure Plan targets, there have been very low numbers of affordable homes provided in recent years, as shown in the table below:

Table 5.2 – Recent affordable homes completions

Tenure	2016/17	2015/16	2014/15	2013/14
Rented	0	21	26	4
Shared Ownership	0	19	43	5
Totals	0	40	69	9

Affordable housing pipeline

A further 14 developments have either detailed or outline planning permission and are either on-site or have not yet started. These developments will provide an additional 370 affordable homes, as follows:

Table 5.3 – Breakdown of affordable homes sites

Site	No. of Affordable Homes	Status (as at 1.6.17)
Knollys Nursery, Waltham Abbey	63	On site
Phase 2 - EFDC housebuilding sites	51	On site
Phase 3 – EFDC housebuilding sites	34	Soon to commence
Phase 1 - EFDC housebuilding sites	23	On site
Barnfield, Roydon	11	On site

Phases 4-6 EFDC housebuilding sites	58	Not yet started
Fyfield Research Park, Ongar	44	Not yet started
Hillhouse Independent Living Scheme, Waltham Abbey	24	Not yet started
Norton Heath Riding Centre, High Ongar	15	Not yet started
Pyrles Lane, Loughton	14	Outline P/P only
Stoneshot Farm, Waltham Abbey	10	Not yet started
Netherhouse Farm, Sewardstone	8	Not yet started
Happy Grow Garden Centre, Thornwood	8	Not yet started
Institute Road, Thornwood	6	Not yet started
Esperanza Nursery, Stapleford Abbotts	1	Not yet started
Total	370	

Local Plan requirements

The Council's adopted Local Plan 1998 (as amended in 2006) seeks the provision of 40% affordable housing on housing developments in excess of 15 homes (or in excess of 0.5Ha) in urban areas and 50% on developments in excess of 10 homes (or in excess of 1,000sqm gross floor space) in rural areas.

Following the Stage 1 District-wide Viability Assessment undertaken by the Council's viability consultants, Dixon Searle, in 2015, the Draft Local Plan seeks the provision of 40% affordable housing on all developments of 11 homes or more (or in excess of 1,000sqm gross floor space).

The affordable housing provision is secured through the use of agreements under Section 106 of the Town and Country Planning Act 1990, with the affordable housing mix on such sites reflecting the private housing mix.

Off-site provision and developer contributions

Both the Adopted Local Plan and the Draft Local Plan make it clear that the Council will always seek the provision of affordable housing on large development sites, if at all possible. This is to ensure that there are sufficient affordable homes provided to meet the assessed affordable housing need. However, it is recognised that, in some exceptional circumstances, on-site provision may not be appropriate. In these cases, either off-site provision of affordable housing, or a financial contribution in lieu of the required affordable housing provision, may be agreed.

When off-site provision is agreed, the amount of affordable housing sought will be at least 40% of the combined number of properties on the large development and the off site

development. For example, on a development of 50 properties, the Council would seek 32 properties off-site (i.e. 40% of the original 50 market homes on the first site + 40% of the additional 32 homes on the second site – which happen to be all affordable homes).

When financial contributions are agreed, the Council will seek a contribution equivalent to the amount of subsidy the developer would have needed to contribute to the affordable housing, if it was provided on-site. The Council will then use this financial contribution to help fund an affordable housing development elsewhere in the District.

In such circumstances, the level of financial contribution needs to be assessed through the developer providing a detailed Financial Appraisal assessing the difference in anticipated property sales values, other income, construction costs and other costs (including a reasonable developer's profit) between a development with all the dwellings being provided as market housing and a development with the required affordable housing provision on site. The Financial Appraisal needs to be supported with appropriate and suitable evidence of the assessed income and costs.

The Council will then arrange for the Financial Appraisal to be reviewed in detail by the Council's affordable housing consultants, the cost of which is met by the developer. When the Council's consultants have all the required evidence and information, they will review the Appraisal and provide the Council with a detailed report on their findings, which will comment on each assumption and will advise the Council on whether or not they are of the view that the proposed financial contribution is appropriate and therefore acceptable.

Affordable housing tenure

In the Government's White Paper "Fixing our broken housing market" published in February 2017, the Government announced that it had decided not to implement its previous proposal to require local planning authorities to ensure that a minimum percentage of all affordable homes on development sites were provided as "starter homes". Instead, the Government said that it "intends to amend the National Planning Policy Framework (NPPF) to introduce a policy expectation that development sites of 11 homes or more deliver a minimum of 10% affordable home ownership units".

The Government's Starter Home Initiative is a mechanism to assist first time buyers between 23 and 40 years of age to purchase a new home with a discount of 20% off of the open market value, up to a maximum sale price of £250,000 outside of London. This can be compared to the more conventional shared ownership schemes, through which first time buyers can purchase as little as 20% equity initially, and pay an affordable rent to a housing association for the remaining equity. Over time, shared owners can purchase remaining tranches of equity (known as "staircasing") up to 100% (80% in rural areas).

Whilst the Starter Home Initiative has a number of benefits, the monthly costs to first time buyers are higher than for shared ownership. Shared ownership has proved to be a very successful, tried and tested form of affordable home ownership for first time buyers in the District for many years. Moreover, developers in Epping Forest have shown little interest in providing starter homes on new developments, especially as the District borders three London boroughs, where the maximum sale price for starter homes is much higher, at £450,000, with similar build-costs.

Therefore, generally, the Council expects developers to meet the Government's minimum 10% affordable home ownership requirement through the provision of shared ownership, and not starter homes.

As can be seen from Table 5.1 above, around 80% of the required affordable homes for the District are needed as affordable rented homes. These are defined by the Government as having rent levels up to 80% of market rents, including service charges. Therefore, based on an affordable housing target of 40%, if 80% of these were provided as affordable rented housing, 32% of all the properties on developments requiring affordable housing should be provided as affordable rented housing, with the remaining 8% provided as intermediate housing (e.g. shared ownership). However, this would be less than the 10% affordable home ownership expected to be required through the NPPF. Therefore, the Council will generally require the tenure split for the affordable housing provision on developments comprising 11 or more homes (or on land in excess of 1,000sqm gross floor space) to comprise at least 75% affordable rented homes and no more than 25% shared ownership homes.

It is essential to ensure that new shared ownership homes are provided at affordable levels and meet HCA requirements, in terms of both the amount of initial equity that is sold to applicants and the rent levels charged by housing associations for the retained equity. Therefore, the Council will include requirements within Section 106 Agreements relating to the provision of shared ownership homes that meet Objective (c) set out at the commencement of this chapter.

Rent levels for affordable rented housing

In an area with high property prices, such as the Epping Forest District, it is usually the case that affordable rent levels at 80% of market rents (including service charges) would be higher than the relevant Local Housing Allowance (LHA) for the area.

The LHA is the maximum amount of rent for which housing benefit can generally be received. If a rent is higher than the LHA level, and the tenant is in receipt of housing benefit, the tenant would have to meet the difference in rent above the LHA level, which is not usually sustainable. LHA levels differ across the District, depending on the Broad Rental Market Area (BRMA) in which properties are located. There are three BRMAs in the District.

For this reason, the Council will work closely with its Preferred Housing Association Partners and other housing associations to ensure that, through the use of Section 106 Planning Agreements, the rents charged by housing associations (and the Council) are no higher than the relevant LHA for the BRMA.

Viability

The Council's Draft Local Plan 2016 reflects the NPPF's requirements that, if it would be unviable for a development to fully comply with the Council's affordable housing policies and requirements, the Council would accept either a lower amount of affordable housing and/or a different tenure mix - subject to the applicant providing a detailed Viability Appraisal, with adequate and appropriate supporting evidence.

The Council has produced a "Guidance Note to Planning Applicants on the Submission of Viability and Financial Appraisals for Affordable Housing" to:

- Provide applicants with greater clarity and guidance on the application of planning policy;
- Inform applicants of the Council's approach to assessing and validating Viability/Finance Appraisals; and
- Help minimise delays in determining planning applications.

The Guidance explains national planning policies and the Council's key local planning policies relating to affordable housing and viability and sets out the Council's requirements for the submission of Viability Appraisals where the developer is of the view that it would be unviable for a development to provide the expected amount and/or tenure of affordable housing.

In such circumstances, the Council will arrange for the Viability Appraisal to be reviewed in detail by the Council's affordable housing consultants, the cost of which is met by the developer. When the Council's consultants have all the required evidence and information, they will review the Appraisal and provide the Council with a detailed report on their findings, which will comment on each assumption and will advise the Council on whether or not they are of the view that the Appraisal can be validated as being acceptable and sound and will identify any areas where individual assumptions or evidence cannot be validated or supported.

Where affordable housing proposals from developers are not considered sufficient or acceptable, it is likely that the Council will refuse planning permission.

Rural housing and rural exception sites

The lack of affordable housing in villages is likely to have a greater effect on the village community and local residents than in urban areas. The opportunities for increasing the amount of affordable housing are also generally less than in urban areas. This is because less suitable sites for development usually become available in rural areas, mainly because of the importance the Council places on protecting the Metropolitan Green Belt, which means that local residents are more likely to have to move away from their local area than residents in larger areas.

This is recognised by both the Council's adopted Local Plan 1998 (as amended in 2016) and the Draft Local Plan, which include a "rural planning exceptions policy", whereby planning permission may be granted on sites that provide all (or nearly all) affordable housing, for which planning applications for market housing would be refused.

However, certain conditions must be met, including that the development must be:

- In smaller settlements that have a recognisable community, distinct and separate from the metropolitan area;
- Small scale;
- In response to a demonstrable local housing need (identified through a rural housing survey);
- Supported by the Parish Council;
- Well-related to the existing settlement; and
- Providing the majority of housing as affordable homes in perpetuity, with only small amounts of market housing provided in exceptional circumstances - where it can be proved, through a Viability Appraisal (submitted in accordance with the Council's latest Guidance Note to Planning Applicants on the Submission of Viability and Financial

Appraisals for Affordable Housing that a wholly affordable housing development would be unviable.

In order to ensure that these rural affordable housing schemes only provide accommodation for local residents, applicants must be:

- Long-established local residents (i.e. those who have lived in the village for at least 5 of the preceding 10 years) requiring separate accommodation;
- Immediate family dependents of long-established local residents;
- Former long-established residents; or
- Living elsewhere, who cannot otherwise take up, or continue to, work in the village.

To date, four rural housing schemes have been provided under the rural planning exceptions policy providing a total of 26 affordable homes, namely: Manns Yard, Willingale; Houchin Drive, Fyfield; Harlow Rd, Matching Tye and School Lane, Abbess Roding.

The Council has selected Hastoe Housing Association to be its Preferred Rural Housing Association Partner, which is working with a number of parish councils to help assess their local housing needs and to provide more rural housing schemes.

Preferred Housing Association Partners and the Epping Forest Strategic Housing Partnership

For a number of years, the Council has operated a Scheme of Preferred Housing Association Partners, through which it currently has four Preferred Partners with whom the Council works in partnership to undertake all affordable housing developments in the District. This is for three main reasons:

- The Preferred Partners have a good understanding of the housing needs of the District and work closely with the Council through regular briefings, meetings and discussions;
- The Council wants to support the Preferred Partners to build up their management base within the District; and
- The Council can work with the Preferred Partners to ensure that they meet the Council's expectations and requirements in terms of, for example, viability, governance, the quality of new developments and their housing management.

The Council has therefore formed the Epping Forest Strategic Housing Partnership, which comprises representatives from the four Preferred Partners and senior Council housing officers. The Council's current Preferred Housing Association Partners are:

- B3Living
- East Thames
- Hastoe (rural specialist)
- Moat

Developers intending to undertake new developments that include any affordable housing are encouraged to seek tenders from each of the Preferred Housing Association Partners, to ensure that they obtain the most competitive price. The Council will only support bids for grant funding to the Homes and Communities Agency from its Preferred Housing Association Partners, and it is a standard requirement in the Council's Section 106 Planning

Agreements with developers that the affordable housing must be provided by one of the Council's Preferred Partners.

In preparation for the increased amounts of affordable housing developments that will be brought forward as part of the proposed site allocations in the Council's Draft Local Plan, including the proposed strategic sites around Harlow, the Council will shortly be selecting at least a further two Preferred Housing Association Partners that meet the Council's criteria and needs in the near future.

Internal space standards

The Council's Draft Local Plan 2016 requires all new homes, including all affordable homes, to meet the minimum gross internal floor areas and storage set out in the Government's Technical housing standards – nationally described space standard (March 2015). These are shown in the table below:

Table 5.4 – DCLG's Space Standards

DCLG's Nationally Described Space Standards Minimum Gross Internal Floor Areas and Storage (m²)						
No. of bedrooms	No. of bed spaces	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage	
1	1p	39 (37 [*])			1.0	
•	2p	50	58		1.5	
2	3p	61	70		2.0	
2	4p	70	79		2.0	
	4p	74	84	90		
3	5p	86	93	99	2.5	
	6p	95	102	108		
4	5p	90	97	103		
	6p	99	106	112	2.0	
	7p	108	115	121	3.0	
	8p	117	124	130		

^(*) Where a 1 bedroom (1 person bed space) has a shower room instead of a bathroom, the floor area may be reduced from 39m2 to 37m2, as shown bracketed.

Key partners

- Homes and Communities Agency
- Preferred Housing Association Partners
- Developers
- Parish and town councils

The Council's Housebuilding Programme

Aim

To increase the Council's housing stock through the construction of new well-designed affordable rented homes on the Council's land and the purchase of good quality affordable rented housing from private developers.

Objectives

- a) Develop good quality new affordable rented homes on Council-owned land that meet the Council's Housing Design Standards and help meet the need for affordable rented homes within the District, funded from the following sources:
 - "One-for-one replacement" Right to Buy capital receipts;
 - Section 106 Planning Agreement contributions from developers in lieu of on-site affordable housing provision;
 - Funding from the Homes and Communities Agency (where possible);
 - The Housing Revenue Account (HRA);
 - Loans from the Public Works Loan Board (PWLB) (when required);
 - Any other external sources of funding that may be identified or secured from time to time; and/or

- Cross-subsidy from the sale of other development sites (if necessary);
- b) Maximise the use of "one-for-one replacement" Right to Buy capital receipts within the required timescales and minimise the amount of receipts that have to be passed to the Government:
- c) Seek and deliver appropriate opportunities purchase new affordable rented housing from developers, at a subsidised price, through Section 106 **Planning** Agreements; and
- d) Charge affordable rents, up to the relevant Local Housing Allowance for the area, for all new homes that are built or acquired by the Council.

Key issues

Background

The Council has made a policy decision to undertake a modest Housebuilding Programme, to build new affordable rented homes on Council-owned land, predominantly difficult to let garage sites (with more than 20% of the garages vacant and with no waiting list), and to purchase affordable rented housing from developers, at a subsidised price, through Section 106 Planning Agreements.

Since the Council had not built any general needs housing since 1985, kick-starting a major development programme without the resource and skills in place was a big challenge.

Therefore, through a competitive procurement process, the Council has appointed a Development Agent (East Thames) to oversee the development process - from the undertaking of initial development and financial appraisals, through to detailed design, planning submissions, procurement of contractors and supervision of the works. The Council has adopted East Thames' Design Standards for its new homes, with some amendments, and has produced a Development Strategy that sets out the Council's approach to its Housebuilding Programme.

The "client" role of the development process is undertaken by the Council's small Housing Development Team; the Housebuilding Programme is overseen by the Council Housebuilding Cabinet Committee, comprising a number of members of the Council's Cabinet.

In March 2017, the Council reviewed the resources available to the Council and identified that there are sufficient resources to continue to fund the Council Housebuilding Programme for the foreseeable future, especially whilst 30% of the costs can be funded from "one-forone replacement" Right to Buy capital receipts. Additional borrowing would be required, although the review confirmed that such additional loans could be repaid within a reasonable period.

Site identification

With around 92% of the District falling within the Metropolitan Green Belt, and with limited suitable land owned by the Council, the Council initially identified a portfolio of 65 garage sites that were designated as 'difficult to let', that may have development potential. These "brownfield" sites are all located in existing Council estates. However, the sites are generally small areas of land with narrow access points, along with a mix of other legal risks associated with access and legal rights of way. By contrast, these new homes will improve the existing environment, reduce anti-social behaviour and contribute towards the revitalisation of existing communities.

Viability of sites

A Financial Appraisal is undertaken on each site to determine whether the development is viable. This is based on a 30-year payback period, and each scheme must produce a positive Net Present Value over the same 30-years. Where the pay-back period is in excess of 30 years, some form of subsidy is required. Any sites found to be unsuitable for development are considered by the Cabinet Committee for alternative uses (such as creating off-street parking, or disposal on the open market).

Development Programme

Following assessment of each of these sites, planning applications were submitted for 56 sites considered to have development potential. Table 6.1 sets out the current position with the planning applications for these sites (as at June 2017).

Table 6.1 – Outcome of planning applications (as at 1st June 2017)

Status	No. of Sites	No. of Homes
Sites that have received planning permission	37	166
Sites where planning applications are pending	4	34

Sites where planning permission has been refused	14	36
Totals	56	229

Following the receipt of planning permissions to date, the Council Housebuilding Programme provided in Table 6.2 has been formulated.

Table 6.2 – Council Housebuilding Programme

Phase	Location(s)	No. of Homes	Status (as at 1.6.17)
1	Waltham Abbey	23	On site
2	Loughton	51	On site
3	Epping, Coopersale, North Weald, Ongar	34	Soon to commence
4	Loughton	31 ^(*)	To be procured
5	Buckhurst Hill, Ongar, High Ongar	13 ^(*)	To be procured
6	Waltham Abbey	14 ^(*)	To be procured
Totals		166	

^(*) Additional homes are expected to be included, once planning applications have been determined

Section 106 planning agreement sites

The Council has already agreed to purchase from a developer the 8 affordable rented homes required under a Section 106 Planning Agreement, at Barnfield, Roydon.

Since such homes that are subject to Planning Agreements are required to be sold at a discount, do not require any Council-owned land and do not require significant Council staff resources to develop, subject to sufficient funding being available, the Council will continue to consider such opportunities as they arise, which will usually have to be in competition with the Council's Preferred Housing Association Partners.

Funding

The Council has agreed that the Housebuilding Programme will be self-funded, without any financial support from the General Fund. The principle funding streams are as follows:

- Capital receipts from Right to Buy sales (referred to as 1-4-1 receipts) The use of 1-4-1 receipts is limited to funding up to 30% of the cost of a replacement home, and is time limited to three years from receipt. Failure to use the 1-4-1 receipts within three years results in them having to be returned to the Government, with interest;
- S106 Agreement contributions from developers in lieu of on-site affordable housing provision These are one-off payments from private developments where the inclusion of affordable housing has been considered to be inappropriate. The Council has agreed that all such financial contributions should be used to help fund its Housebuilding Programme. Although the Council can agree the trigger point for payment of the S106 contribution, the timing of the cash flow cannot be relied upon as the Council cannot control when the developments start on site;

- Loans from the Public Works Loans Board (PWLB) The Council already has significant loans from the PWLB, some of which are able to fund the Housebuilding Programme, but additional loans will be required in the future.
- The Council's own housing (HRA) balances. Rents from its existing Council properties are able to be used to help fund the Programme.

Affordable Rent Policy

The Council has adopted an Affordable Rent Policy, which determines the rent level to be charged for properties built or acquired under the Housebuilding Programme, which is the lower of:

- 80% of market rents for the location; or
- The Local Housing Allowance within the Broad Market Rental Area in which the property is situated.

The Broad Market Rental Area (BRMA) in which the property is situated is set by the Rent Officer Service, based on the 30th percentile of market rents in the BMRA (although, due to annual freezes in LHA levels, they are now based on less than the 30th percentile of market rents in reality). The Epping Forest has 3 BMRAs. The Local Housing Allowance (LHA) is the maximum amount that can be paid to a tenant in housing benefit. Therefore, any difference between the actual rent and the LHA must be paid by the tenant themselves.

Contractors

Generally, contractors are procured through the use of East Thames' EU-compliant Contractors Framework. Generally, design and build contracts are utilised but, for Phase 3, the Council has adopted an alternative procurement strategy that breaks down the eight sites into seven separate contracts, with a mixture of design & build and traditional fully-designed contracts. This was primarily to overcome the lack of interest from many developers for multi-site contracts, due to the complications and difficulties of contractors managing dispersed sites.

Key partners

- East Thames and their consultants
- Contractors
- Public Works Loan Board
- Parish and town councils

Chapter 7

Homelessness

Aim

To prevent homelessness and to respond to homelessness applications in accordance with statutory requirements, efficiently, effectively and fairly, helping homeless people to secure appropriate accommodation and keeping the use of bed and breakfast accommodation to a minimum.

Objectives

- a) Prevent homelessness wherever possible and provide appropriate advice and assistance to homeless and potentially homeless people;
- b) Carry out the Council's statutory duties and investigate homelessness applications thoroughly and fairly;
- Ensure that adverse homelessness decisions are reviewed, when requested, within statutory time limits;
- d) Continue to provide hostel accommodation and effectively manage the Council's hostel for the benefit of homeless people;
- e) Continue to work closely with Epping Forest Housing Aid to secure rent deposit guarantees;
- f) Provide rental loans and landlord deposits to enable homeless people to access accommodation in the private rented sector;

- g) Continue to work with Safer Places to enable victims subjected to domestic abuse to be accommodated in safe and secure accommodation and, for those who wish to do so, to stay safely in their own homes;
- Seek to minimise the numbers of homeless households that are in temporary accommodation at any one time;
- i) Continually explore alternative and innovative options for the provision of temporary accommodation, in order to minimise the use of bed and breakfast (B&B) accommodation, and seek to ensure that only single people are accommodated in B&B;
- Review the Council's Homelessness Strategy every three years;

Key issues

Background

Under the Housing Act 1996 (as amended) and the Homelessness Reduction Act 2017, the Council has a statutory duty to prevent, investigate and respond to homelessness applications. When investigating applications and considering its response, the Council must consider whether or not an applicant:

- Is homeless and eligible for assistance;
- Has a priority need;
- Is homeless intentionally; and
- Has a local connection with the District.

Depending on the outcome of these investigations, the Council's duties in response range from having a "full duty" to provide or secure permanent accommodation through to only providing advice and assistance.

The focus of the Council's work will continue to be to prevent homelessness occurring in the first instance and assisting applicants to find alternative accommodation themselves before their homelessness occurring, rather than providing Council housing itself or making a nomination to a housing association.

The Council produces a detailed Homelessness Strategy every 3 years, the last one covering the period 2015-2018.

Homelessness Prevention Team

The Council has a Homelessness Prevention Team, providing homelessness advice and assistance to people presenting themselves as being homeless or threatened with homelessness. The Team work with applicants to consider all the options available which could prevent the household from becoming homeless before they make a formal homelessness application.

Homelessness Prevention Officers provide a comprehensive service with a range of initiatives at their disposal to assist them with resolving the housing difficulties of clients they are seeking to serve. However, when the Homelessness Reduction Act 2017 (see below) comes into force in 2018, additional duties and responsibilities will be placed upon the Team.

Table 7.1 shows the number of cases presented to the Homelessness Prevention Service over the last four years and the reasons. It should be noted that these figures do not take into account the many other enquiries made by the general public. The success of the Homelessness Prevention Service has had a direct impact on the homelessness acceptance rate, which otherwise would have been much higher.

Table 7.1 – Number of cases presented to the Homelessness Prevention Service

Prevention Action	2013/14	2014/15	2015/16	2016/17
Mediation	2	2	1	1
Reconciliation	8	3	4	2
Financial payments from homelessness prevention fund	3	2	1	1
Debt advice	3	4	2	1
Resolving housing benefit problem	13	6	9	7
Sanctuary scheme for victims of domestic violence	5	2	9	0

Crisis intervention	4	3	4	2
Negotiation to help someone remain in the private rented sector	17	7	3	8
Providing other assistance to enable someone to remain in private rented sector	28	30	64	27
Mortgage arrears	15	5	0	5
Other homelessness prevention measure, where work has commenced but there has been no further contact and resolution is unknown	228	268	279	237
Housed in hostel or HMO	6	1	2	5
Housed in private rented sector with landlord incentive scheme	91	66	71	48
Housed in private rented sector without landlord incentive scheme	53	80	57	53
Accommodation arranged with friends or relatives	39	30	24	37
Supported accommodation	22	29	34	12
Social housing management move	9	8	6	4
Social housing: Housing Register offer	41	45	37	31
Social housing: Housing Association direct offer	10	13	13	2
Low cost home ownership scheme	1	1	1	0
Other homelessness relieved	9	4	4	14
Total cases prevented	613	615	625	497

Reasons for homelessness

There are a number of reasons why people become homeless. Table 7.3 sets out the reasons for households in Epping Forest becoming homeless over the past four years. As can be seen, one of the most common reasons for homelessness is the loss of privately rented accommodation.

Table 7.3 – Reasons for homelessness

Reason for acceptance	2013/14	2014/15	2015/16	2016/17
Parents not willing to accommodate	16	8	13	9
Other relatives not willing to accommodate	2	6	2	0
Non-violent relationship breakdown	1	3	4	2

Violent breakdown of relationship (partner)	4	6	6	8
Violent relationship breakdown (involving associated person, such as a relative)	0	0	2	1
Racially motivated violence	0	0	0	0
Other forms of violence	1	0	2	0
Racially motivated harassment	0	0	0	0
Other forms of harassment	0	0	0	0
Mortgage arrears	3	0	1	0
Local authority rent arrears	2	0	0	0
Housing Association rent arrears	0	1	2	0
Private rented rent arrears	4	6	9	6
Termination of assured short-hold private sector tenancy	25	11	17	11
Reason other than termination of assured short hold tenancy, such as tied accommodation	5	7	12	16
Leaving asylum accommodation	0	1	0	1
Leaving prison / remand	0	0	0	0
Left hospital	1	0	0	0
Left other institution or Care	0	1	0	0
Leaving armed forces home	0	0	0	0
Other reason	1	2	1	2
Total	65	52	71	56

Categories of homeless applicants in Priority Need

Table 7.4 below provides an analysis of the applicants found to be in priority need, unintentionally homeless and owed a full homelessness duty. As can be seen, households with dependent children (including the violent breakdown of a relationship with their partner) represent the highest number of acceptances in each of the last four years.

Table 7.4 – Analysis of homeless applicants

Priority need category	2013/14	2014/15	2015/16	2016/17
Applicant homeless because of fire, floor, storm or similar disaster	0	1	0	0
Applicants with dependent children (including violent breakdown of relationship with partner)	50	37	55	40
Applicants in priority need because of pregnancy but no other children	3	0	0	0
Applicants aged 16-17 years	1	0	0	1
Applicants formerly in care and aged 18-20 years	1	1	0	0
Applicants vulnerable due to old age	3	1	1	1
Applicants vulnerable because of physical disability	0	6	6	5
Applicants vulnerable because of mental illness or learning disabilities	6	5	7	6
Applicants vulnerable due to alcohol dependency	0	0	0	0
Applicants who were former asylum seekers	0	1	0	1
Vulnerable for other special reason	0	0	0	0
Applicant vulnerable having been in custody or remand	0	0	0	0
Applicants vulnerable for formerly being in care	0	0	0	0
Applicants with care and support needs having served in HM Forces	0	0	0	0
Applicants (with no children) vulnerable on account of violence including domestic violence	1	0	2	2
Total applicants accepted for a priority need	65	52	71	56

Homelessness Reduction Act 2017

The Homelessness Reduction Act 2017 received Royal Assent in April 2017 and places considerable additional duties on local authorities nationally to prevent and reduce homelessness. The provisions are expected to be introduced from April 2018, following the production of a new Homelessness Code of Guidance by the Government to take account of the new Act.

The Government has recognised that the provisions in the Act will make a significant call on the resources of local authorities and has said that it will provide financial support to help meet the additional burdens of the new duties. The main additional duties are (in summary) as follows:

• The period that a person can be considered to be threatened with homelessness (when the Council's new duties start) is extended from 28 days to 56 days;

- An applicant seeking homelessness support is to be automatically judged to be homeless once the period specified in a Section 21 Notice expires (which is the standard notice period provided by private landlords to tenants and is recognised as the single biggest cause of homelessness), preventing councils advising applicants to remain in occupation beyond expiry;
- An assessment of an applicant's case must be undertaken, which must be provided to the applicant with a personal housing plan in order to provide effective support;
- Applicants have a right to a review of their assessment; and
- A requirement for local authorities to secure accommodation for at least 12 months for all applicants whom the authority is satisfied are eligible for assistance, regardless of priority need.

Homelessness funding

The Council currently receives two main sources of external funding to assist with the prevention and response to homelessness, with an expectation that a third source of funding will be introduced during 2017/18.

For a number of years, the Council has received annual homelessness prevention funding from the Government. The current funding is for around £110,000 per annum, until April 2020 when the funding will be reviewed. This funding is used to fund the costs of some of the Council's Homelessness Prevention Team.

In April 2017, the Government introduced its new Flexible Homelessness Support Grant to local authorities (replacing its former Temporary Management Grant) and has committed to provide £277,000 and £313,000 to the Council in 2017/18 and 2018/19 respectively to fund homelessness services. This replaces the Council's previous Temporary Management Grant of£60,000 per annum. In June 2017, the Council's Cabinet agreed the use of some of the grant and will give consideration to the use of the remaining grant later in 2017/18, once the effects, implications and costs of the Homelessness Reduction Act 2017 are better known.

The Government has already recognised that the Homelessness Reduction Act 2017 will place considerable additional duties and burdens on local authorities and, for this reason, has announced that it will provided additional financial support to local authorities to help meet the new duties. It is expected that further details will become available during 2017/18.

Avoiding bed and breakfast accommodation – increased temporary accommodation

The majority of homeless households with dependent children seeking assistance from the Council are, in the first instance, accommodated temporarily at the Council's Homeless Persons Hostels at Norway House, North Weald or at Hemnall House, Epping.

Due to the numbers of homeless households that the Council has to assist each year, it has been necessary for a number of years to temporarily accommodate some homeless people in bed and breakfast accommodation, until more permanent accommodation can be secured for them. The law says that councils should only place homeless households with dependent children in B&B accommodation in emergencies and, even then, for no more than 6 weeks. For this reason, the Council mainly uses B&B hotels to temporarily accommodate single people.

However, this form of accommodation is still avoided as much as possible since, not only is it not the most appropriate form of accommodation for homeless people (and often located outside the District), it is also costly to the Council to use. The net cost to the Council's General Fund of accommodating a single person in a B&B hotel is currently around £8,300 per year, which represents the Government penalty of reduced subsidy that the Council receives to meet the cost of providing housing benefit to residents for using B&B accommodation.

For these reasons, the Council is continually seeking new and innovative ways to increase the amount of alternative forms of temporary accommodation for homeless people.

Two recent initiatives are:

 The proposed provision of temporary modular accommodation (referred to as "pods") at Norway House, North Weald - to provide temporary accommodation for homeless households, at a lower cost than traditionally-built, permanent accommodation and than placing homeless households in bed and breakfast hotels.

A pilot scheme for 3 pods to accommodate 6 vulnerable single homeless people has been agreed, which is currently being procured. As a result of the saving in the housing benefit subsidy penalty and the income from the licence charges, the payback period for providing one pod is less than 4 years, since 30% of the capital costs will be funded from "one-for-one replacement" Right to Buy receipts.

• The use of private rented accommodation at the Zinc Arts complex, Ongar to provide temporary accommodation - the Council has agreed to use, for a trial period, 3 of the 25 units at the complex to accommodate homeless households who would otherwise be accommodated in B&B hotels. Under the agreement, the Council is providing "top-up funding" to the landlord of around £1,900 per annum per property. This is being funded from the Government's Flexible Homelessness Support Grant and represents the difference between the agreed rent levels and the relevant Local Housing Allowance (LHA) for the area. Not only is this a better form of temporary accommodation than B&B hotels, it also results in net saving to the Council's General Fund of around £6,400 per household per annum.

The success of the trial will be reviewed in due course.

Preventing homelessness initiatives

The Council has a number of initiatives in place to assist those who have either lost their home or are facing eviction. The main initiatives are set out below:

Epping Forest Housing Aid Scheme (EFHAS)

One of the difficulties that homeless and other housing applicants have in accessing the private rented sector (especially those in receipt of housing benefit) is to provide damage deposit guarantees in advance of occupation, which is routinely required by private landlords. Because of this, many homeless applicants have no alternative but to seek accommodation from the Council. If they are in a priority need category, the Council then has a legal duty to provide accommodation.

The EFHAS is a scheme for helping homeless people to access private rented accommodation by providing damage deposit guarantees to the landlords of the properties

the applicant wishes to rent. All the guarantees are covered by money held in EFHAS's bank account.

EFHA was set up as a charity in 1995 with financial support from the National Lottery Charities Board and grants of £31,500 from the Council. In addition, the Council has also agreed to underwrite up to £60,000 of damage deposit guarantees, in order to ensure that the guarantees do not over-commit EFHAS's available resources. Since the scheme has been introduced, the Council has not been called upon to pay out any of the underwritten guarantees.

Between 1995 and 2017 EFHA has helped over 350 homeless families move into the private-rented sector who, without this assistance, would otherwise have been unable to do so. Many of these families would have had to seek accommodation from the Council direct. Currently there are 72 guarantees in place, totalling around £57,000.

All referrals to the EFHAS are made by the Council through the Homelessness Prevention Team. Assistance can also be given to applicants who do not have sufficient furniture through the Furniture Re-use Scheme based in Epping.

Rental Loan Scheme

The Council's Rental Loan Scheme was set up in 2008 and complements the EFHAS scheme (referred to above) by providing applicants with a rental loan to meet the cost of the first month's rent in advance, and/or the required landlord's deposit, when securing accommodation in the private sector. Applicants are required to repay the loan on an interest-free basis over 36 months, thereby recycling the loan to enable others to benefit from the scheme in the future.

Families who are assisted with rental loans have their new accommodation inspected by the Council's Private Sector Housing Team to ensure they are suitable and free from any significant hazards.

Housing Association Leasing Direct (HALD)

The Council set up a Housing Association Leasing Direct (HALD) scheme with Genesis Housing Association in 2010. The Council has assisted 17 households to date in accessing accommodation under the scheme, through nominations made by the Homelessness Prevention Team, who would otherwise have been homeless. Those referred to the scheme must be eligible for full housing benefit in order to qualify for assistance, with the household being able to remain in the property for two years under an assured short-hold tenancy.

Private Lease Agreements Converting Empty Properties (PLACE) Scheme

The PLACE scheme has been set up by a consortium of seven councils, including this Council, following a successful bid for DCLG funding. The Scheme offers a capital grant to owners of long-term empty properties to renovate their property to a standard suitable for letting. In return, the owner is obliged to lease the property for three years to Genesis Housing Association and the accommodation is made available to families nominated by the Homelessness Prevention Team.

Parental exclusions – mediation

Young people can sometimes have volatile relationships with their parents and can be at risk of exclusion from their home. Essex County Council's Social Services, in partnership with the Council's Homelessness Prevention Team, undertake mediation in a number of cases each year through specialist homelessness youth workers to attempt to reconcile young people with their parents in order for them to remain at home.

Young Parent Scheme

Railway Meadow in Ongar is a supported housing scheme provided in partnership with Brentwood and Uttlesford Councils to support young parents in overcoming challenges during their pregnancy and the first year of their child's life. The scheme comprises 13 self-contained flats with a communal lounge, activity area, training kitchen and office. The accommodation is offered to young mothers, fathers and couples aged between 16 and 25 years of age. The support gives young people essential parenting and life skills to enable them to move on and live independent lives.

The scheme is owned and managed by East Thames and referrals are received from the Council, and Brentwood and Uttlesford Councils, with residents being re-housed by their host authority at the appropriate time. Epping Forest District Council has nomination rights to eight of the flats.

"Sanctuary" Scheme

The Council's "Sanctuary" Scheme assists victims of domestic abuse or Hate Crime on a tenure neutral basis. The scheme provides a safe room within the victim's home. A typical sanctuary room includes a fire door with mortice locks, smoke detectors, fire blanket and two fire extinguishers. The Council's Community Safety Team works in partnership with Essex Police, Essex Fire and Rescue and Safer Places on the provision of the schemes, with all referrals made through the Homelessness Prevention Team. There are currently five "active" sanctuary rooms installed which have prevented homelessness, with 16 Sanctuary schemes installed across the District since the scheme was first introduced.

Single Accommodation for Epping Forest (SAFE) Scheme

SAFE was set up in 1983 and is managed by NACRO Community Enterprises, a registered housing association and charity, which offers supported accommodation to single people.

The scheme works in partnership with Social Care's Divisional Based Intervention Team, the Essex Probation Service, the Youth Offending Team and Family Mosaic Support. The scheme helps resolve the housing difficulties of single people across the District who would otherwise become homeless. The Council originally provided SAFE with land free of charge for the first properties and SAFE now provides 37 bedspaces across the District.

The accommodation provides a mix of both shared and self-contained housing. On average, around 20 single young people are provided with accommodation each year.

The Council also provides move-on accommodation for some SAFE residents who are unable to access the private sector, through direct offers of Council accommodation. This enables a through-put of single people assisted by the Scheme.

Rough sleeping

Generally, the Council only identifies a very small number of rough sleepers within the District – mainly, due to the work of the Homelessness Prevention Team.

Following the cessation of a DCLG grant to assist local authorities to deal with rough sleeping, through an outreach service provided by St Mungo's Broadway (a homelessness charity), the Council has agreed to continue this work and fund a local outreach service for rough sleepers, and is currently identifying an appropriate organisation to arrange for support workers to visit rough sleepers, provide advice, arrange short-term night shelter accommodation and try to make arrangements for them to reconnect with any area with which they have an established connection.

Discretionary housing payments

Discretionary housing payments (DHPs) are paid to tenants in receipt of housing benefit who need additional help with their housing costs. Private sector tenants in particular, who have a change of circumstances (such as a loss of employment), may find that their contractual rent is higher than their housing benefit entitlement. DHPs can help such tenants meet the shortfall and prevent them going into arrears and subsequently becoming homeless. Payments are made over a short period until the tenant's circumstances improve or they obtain more affordable accommodation.

Key partners

- DCLG
- Essex Community Rehabilitation Company
- Essex Children's and Families Service
- Epping Forest Community Mental Health Team
- NACRO Community Enterprises
- East Thames

- Moat
- Epping Forest Housing Aid Scheme
- Relate
- Epping Forest Citizens Advice Bureau
- Safer Places

Chapter 8

Supported Housing for Older and other Vulnerable People

Aim

To help vulnerable people with special housing needs to live in homes suitable for their needs, with appropriate levels of support.

Objectives

- a) Work with other statutory and voluntary agencies to enable people with special housing needs to live in homes suitable for their needs, with appropriate levels of support;
- Ensure that supported housing and outreach support services of the right type are provided to those in most need at an economic cost;
- c) Encourage the provision of "lifetime homes" within all new developments;
- d) Undertake adaptations to Council properties to enable tenants with physical disabilities to remain in their existing homes;
- e) Deliver disabled facilities grants (DFGs) and discretionary Housing Assistance to assist older and vulnerable residents remain in their own homes;

- f) Ensure that the Council is aware of, and takes steps to meet the needs of, the ageing population in Epping Forest;
- g) Provide advice and support to older owner-occupiers needing to arrange repairs and improvements to their homes, including energy efficiency advice, through the Council's CARE Agency;
- h) Ensure that accommodation at sheltered housing schemes meets modern standards, suitable for older people;
- Provide help to older people in their homes who need monitoring and emergency assistance, through the Council's Careline Service; and
- j) Provide Handyperson Services for older people living in the District.

Key issues

Older people

Population forecasts by the Office for National Statistics suggest that the population of Epping Forest residents over 65 years of age will increase over future years. Findings of the West Essex and East Hertfordshire Strategic Housing Market Assessment (SHMA) show

that just over 8% of the population of this region are aged 75 years or above. This suggests that increased housing support will be required to a larger number of older people.

Table 8.1 - Current and projected population of older people

Proportion of people aged 75+	Current	Projected (2033)
Epping Forest District (ONS, 2014)	9.2%	12.3%
West Essex and Herts region, SHMA (2011 Census)	8.0%	12.4%

Study into the impact of an ageing population in the Epping Forest District

In 2016, the Council undertook a major study into the Impact of an Ageing Population in the Epping Forest District. National statistics estimate that between 2015 and 2020, over a period when the general population is expected to rise by 3%, the numbers of people aged over 65 are expected to increase by 12%; the numbers aged over 85 by 18%; and the number of centenarians by 40%. This will impact on every community across the UK but, in particular, those areas already starting from an elderly demographic baseline.

The Epping Forest District falls within this category, with over 25,000 people aged 65 and older already living within the District and an additional 27,000 people aged over 50 years. In order to help the Council understand the effects and impact of an ageing population on services within the district, a Key Action was included within the Council's Corporate Plan 2015–2020, for a study to be undertaken to assess potential needs of older people over the next 10 to 20 years. The following three key priorities were chosen for the study, as they relate to services provided by the Council and local partners and are key contributors to general wellbeing and quality of life:

- Health and Wellbeing current and future physical, mental and emotional health and wellbeing;
- Living in Epping Forest homes, services at home, services in the community, transport and accessibility and plans for future living; and
- Communication current and future needs for receiving and sending information to the Council and partner organisations across the district.

The study included interviews with staff and councillors from across the Council, at all levels, to gain an understanding of the various issues relating to older people that are already being identified. The discussions covered issues from potential increases in the number of people requiring assisted waste collections to the impact on finance and benefit services.

Meetings were then held with a range of external partners at senior management levels, including Essex County Council's Public Health Team, the West Essex Clinical Commissioning Group, Voluntary Action Epping Forest, Age UK, British Red Cross (Community Agents), Alzheimer's Society and various other services from the voluntary (Third) sector.

Following the initial research, a series of focus groups and consultation workshops for older people were then held around the District, from all demographics, including people involved in high levels of physical activity and those leading more sedentary lifestyles.

One of the key focuses of the study was the levels of dementia in the District which, as can be seen from Table 8.2, is expected to increase significantly by 2025:

Table 8.2 – Forecast growth in people with dementia in Epping Forest and Essex

	2013	Projected (2025)	Growth
Epping Forest	1,855	2,553	37.6 %
Whole of Essex	20,302	29,304	44.3 %

The findings of the study confirmed that, to meet the needs of the current and future ageing and elderly population of the Epping Forest District, statutory organisations including the Council, Essex County Council, the NHS and third sector partners, need to be planning together - and 'for real' - to make best possible use of local resources. There is no room for duplication of services, or use of high-cost interventions, when there are initiatives that can produce the same results on a much smaller budget.

The study established, from discussions held with all of the older people interviewed, that most older people's aim is to try and remain in their own homes for as long as possible and that, when the time comes when they will be less mobile, they would much prefer to stay in their own homes and have adaptations and support provided to them in their existing homes. Most said that they would only seek to live in residential care homes, or even move to smaller accommodation, if they had exhausted all options for living in their existing home.

Retaining independence was highlighted as the most important aspect of their lives, followed by living near friends and/or family. Even in cases where one member of a couple has dementia or other impairment, their partners wish to keep the person in their own home for as long as they can. However, it was acknowledged that this was not always possible without support from local services and the expectation was that there would be a need for these to be gradually expanded to cope with future demands.

A detailed report on the Study was produced, which provided an overview of the work undertaken, the findings and a series of recommendations. A Key Action Plan was then formulated, comprising 32 separate actions to be undertaken by a range of local organisations, including the Council. Progress with the Key Action Plan is monitored by the Council's Communities Select Committee every 6 months.

The Local Plan and "lifetime homes"

It is important that a proportion of new homes provided in the District can, through the design of those homes, provide for the needs of people with, or who may develop, accessibility needs. This reflects the evidence set out in the latest Strategic Housing Market Assessment, referred to in Chapter 4, that there is an existing need for accessible housing in the District, which will continue, taking into account the ageing profile of the District's population over the period of the Local Plan. Improving housing standards to strengthen local communities and reduce the need for residential care by enabling vulnerable people to remain in their homes, or be able to have the choice to be able to move into a new home, is an important part of improving the overall housing mix within the District.

Consequently, the Council's preferred approach, set out in its Draft Local Plan is that all new homes should be built to Category 2 (Accessible and Adaptable Homes) Building Regulation Standards (previously referred to as "lifetime home" standards).

The needs of those with accessibility difficulties, including older people, can be supported by bungalow accommodation. However, recent information contained in the Council's Annual Monitoring Report shows that there has been a gradual erosion of the District's existing stock of bungalows. The Council therefore considers that bungalows can play an important role, because of their potential ease of adaptation – meaning that they can provide choice for people with accessibility needs, including the current and future needs of older people.

Draft Policies H 1 and H 2 of the Draft Local Plan (Housing Mix & Accommodation Types and Affordable Housing) therefore include provisions for enabling disabled and older people to remain in their own home for as long as possible through only permitting developments that:

- Provide a mix of market and affordable housing that include a range of house types and sizes to address local requirements, including for 'down-sizing';
- Provide for all new homes to be accessible and adaptable as defined by the Building Regulations in effect at the time of the application; and
- Supporting proposals for housing specifically designed to meet the identified needs of people with support needs (including older people), requiring specialist accommodation, where:
 - They meet a proven identified need;
 - The location is appropriate in terms of access to facilities, services and public transport; and
 - They are of an appropriate design to accommodate the required amenities and support staff.

In addition, where there is evidence of an identified unmet need in the local area and the location is appropriate in terms of access to facilities, services and public transport, the Draft Local Plan requires larger scale new residential developments to incorporate specially designed housing/specialist accommodation for people with support needs (including older people) and for self/custom build schemes, with affordable housing being required to be provided on all such developments. The loss of bungalows will also be resisted, as they provide a supply of accessible accommodation.

Sheltered housing and independent living

There has been a shift in the housing needs of older people in recent years, away from accommodation-based support, such as sheltered accommodation, towards more floating support and the provision of telecare. Table 8.3 provides details of the different types of accommodation of older people, and their numbers, in the District:

Table 8.3 – Number of schemes providing supported accommodation

Туре	Number of buildings	Number of properties
Sheltered housing	13	468
Schemes for frail older people	2	99
Residential accommodation	13	469
Nursing homes	4	260
Total	32	1,296

It is clear that rented sheltered accommodation and schemes for frail older people are far less popular amongst older people than in the past; often, Council sheltered accommodation is allocated to housing applicants with quite low levels of housing need, and some schemes are difficult to let – whereas the housing need for general needs housing applicants continues to increase.

Many Council properties on housing estates that have previously been considered particularly suitable for older people, and therefore designated for older people, have had to be de-designated and let to younger people in recent years, due to a lack of demand. Therefore, there is no need to provide any more rented sheltered accommodation for older people in the District.

However, there is a need for additional rented and market independent living (or "extra care") schemes in the District, as illustrated in Table 8.4, which is based on the latest data from Essex County Council:

Table 8.4 – Need	and supply	for inder	pendent livina	schemes in	Epping Forest

Tenure	Identified Need	Existing Supply	In Development	Shortfall
Affordable Rented	84	40	24	20
Market Housing	143	0	36	107
Total	227	40	60	127

Review of the Council's sheltered housing assets

The Council has a number of sheltered housing schemes across the District, some of which are coming to the end of their operational life and will soon no longer be fit for purpose - unless significant investment is provided to bring them up to modern standards. For example, some schemes still provide bed-sit accommodation, which is no longer considered suitable for older people.

During 2017/18, the Council will be undertaking a review of its sheltered housing assets in order to determine the most appropriate approach for the future. This will include assessing the current standard, condition and lettability of, and need for, the Council's existing sheltered housing schemes and proposals for the future.

Review of the Council's Sheltered Housing Service

The Council currently provides a Sheltered Housing Service to all of its tenants in its sheltered housing schemes (who live in purpose-built accommodation and receive a daily visit from the Scheme Manager) and a reduced level of service to older people living in other designated accommodation for older people (comprising a bi-weekly, weekly or fortnightly visit from a Scheme Manager) for which charges are made.

However, there are increasing numbers of older people living in sheltered accommodation and other designated accommodation for older people who say that they do not wish to receive such an intensive support service; whilst there are other older people living in non-designated Council accommodation and private accommodation, including owner-occupiers, who are in need of this service and are willing to fund the cost.

The Council will therefore be undertaking a review of its Sheltered Housing Service in order to determine the most appropriate approach for the future. Under the Review, consideration will be given to having teams of Scheme Managers covering specified areas and visiting older people in sheltered housing schemes where the service is most needed. In addition, the provision of a Supported Housing Service to older people living in other Council properties and the private sector will be explored.

Epping Forest Careline

The Council provides a Careline Service, which offers a 24 hour, 365 days per year, emergency alarm monitoring service to older and disabled people living within the District. The Service is also offered to other vulnerable groups, including victims of domestic violence and younger people with disabilities.

The Council's own sheltered housing schemes and other designated dwellings for older people on housing estates have a hard-wired system installed in their properties with a speech module mounted on the wall and a pull cord in each of the rooms. There are currently around 2,230 properties in the District linked to the centre in this way.

Around 1,380 of the connections are in private individuals' homes, which are connected via a dispersed alarm, which has an associated neck-worn radio trigger. A range of various sensors are offered, for example on-line smoke alarms and fall/flood detectors. The Council aims to install a basic dispersed alarm for any new private client when requested on an urgent basis within two working days of receiving the application. This timescale is regularly achieved.

Council representatives regularly give presentations to local groups and other agencies promoting the service. In addition, leaflets and posters are placed at the Council's information points, libraries, and Citizens Advice Bureaux. The service is advertised in the local press, and the Council's tenants' magazine "Housing News".

In the past, annual funding for the Careline Service was provided by Essex County Council. However, following continuous reductions in funding over a number of years, this funding was totally ceased in April 2017, resulting in the Service having to be fully-funded from charges made to users from this date. However, the County Council does contribute towards the cost of the initial provision of all telecare equipment and continues to meet the service user's Careline charge for the first 12 weeks, in order to encourage and demonstrate to users the benefits of receiving the Service.

The Careline Monitoring Service is currently provided by the Council itself. However, following a detailed review earlier in 2017, the Council's Cabinet agreed that it would be more cost effective and resilient in the long term if the Monitoring Service was outsourced to a larger third party provider. Following a competitive tender exercise, it is planned that the new third party provider will provide the service from late 2017. However, the Council will continue to take overall responsibility for its Careline Service, of which the Monitoring Service forms a part, including the installation of new equipment and updating residents' information.

Disabled adaptations to Council properties

The Council undertakes and funds adaptations to the homes of disabled and older Council tenants, based on assessments and recommendations from occupational therapists funded by Essex County Council's Adult Social Care Service, to enable them to stay in their own homes for as long as possible. Unlike disabled facilities grants (see below) the need for

adaptations are not means-tested. Expensive adaptations are not provided if it would be more appropriate for the household to move to more suitable alternative accommodation

The Council spends around £400,000 per annum on major disabled adaptations and £25,000 per annum on minor adaptations.

In 2016/17, 125 minor adaptations (such as handrails and slopes) and 213 major adaptations (for example, installation of stair lifts and wet-rooms) were undertaken. On average, minor adaptions are generally undertaken within 2-3 weeks, with major adaptations undertaken within around 6-10 weeks.

Disabled facilities grants (DFGs)

The provision of disabled facilities grants (DFGs) is a statutory function of the Council. They are means-tested grants given to occupants of private and housing association properties for adaption works to their home. In order to help meet the cost of providing them, local authorities receive an annual fund from the Government. Until 2014, this funding came direct from the DCLG but now comes by way of the Better Care Fund (BCF). This was £665,000 in 2016/17, which was around 85% more than the amount received the previous year (£360,000).

The legislation and rules governing the provision of DFGs are nationally determined. Applications are initiated by individual referrals made by Occupational Therapists funded by Essex County Council's Adult Social Care Service. This means that the number of applications received is essentially outside of the Council's control.

Demand has continued to increase year on year and balancing the funding with the level of demand has become more of challenge since the introduction of the BCF, because of the wide variations in funding from year to year. This is in addition to the fact that the amount to be received is not generally announced until shortly before the beginning of the financial year, after the Council has already set its own budgets for the estimated amount that it must fund itself.

CARE Service (Caring and Repairing in Epping Forest)

CARE is the Council's Home Improvement Agency (HIA) service which is managed and run in-house by the Council. It helps people in need of care and support in the private housing sector, mainly those who are older and/or disabled, to live independently in the community for as long as they want to do so. The range of services provided by CARE includes:

- Housing related information, advice and practical support planning;
- Handyperson services;
- The organisation of modifications to home environments, from minor alterations to complex major disabled adaptations;
- Assistance with accessing benefits and obtaining funding for improvements; and
- Signposting to additional support services.

On average, CARE deal with around 900 enquiries each year. However, a large part of its work is the administration of the majority of disabled facilities grant (DFG) applications on behalf of qualifying residents, providing invaluable technical support and assistance.

Until April 2017, CARE was funded from a combination of fees to service users, funding from the Council and £51,000 from Essex County Council's (ECC) Housing Related Support budget. However, the County Council's funding was withdrawn from April 2017. Therefore, in order to be able to continue this valuable service, the Council agreed to replace the County Council's funding with top-sliced funding from the Better Care Fund from 2017/18. For future years, the capital allocation for DFGs will be monitored on an ongoing basis to ensure the viability of this source of funding.

Handyperson services

All older people living in the District receive a free Handyperson Service, through which small household jobs are undertaken by professional tradesmen. Council tenants living in its sheltered accommodation receive the service through the Council's Housing Repairs Service, whilst other Council tenants and private occupiers receive the service through Voluntary Action Epping Forest (VAEF), which is also funded by the Council.

Internal Decorating Service for Council tenants

The Council provides an Internal Decorating Service for older or disabled Council tenants who need help with decorations. Normally this is the tenant's responsibility, but the Council decorates one room of choice every 5 years, free of charge, for people who are over 65 years of age, or receiving disability benefits, with a clear rent account, living in 1 or 2 bedroom properties.

Key partners

- Essex Police
- Essex Fire and Rescue Service
- West Essex Clinical Commissioning Group
- Essex County Council
- Voluntary Action Epping Forest
- Better Care Fund
- Private landlords
- Housing associations

Gypsies and Travellers

Aim

To understand the housing needs of gypsies, travellers and travelling showpeople to ensure that an appropriate number of authorised sites are provided within the District, based on requirements.

Objectives

- a) Reduce the incidence of gypsies and travellers becoming homeless through eviction, without having alternative sites to move to;
- b) Improve living conditions on the sites, through setting and enforcing site licence conditions;
- Meet the assessed need for pitch provision and reduce unauthorised encampments; and
- d) Minimise the impact of gypsy and traveller sites on the countryside and the settled communities.

Key issues

Introduction

The Council is required to plan to meet the identified housing needs of gypsies and travellers which, for the purposes of this Housing Strategy, includes travelling showpeople. The provision of sites for gypsies and travellers is often a contentious issue. As legally recognised ethnic groups, Romany gypsies and Irish travellers are protected by equality legislation. This means that it is unlawful to treat them less favourably than other groups, including the provision of the opportunity to live in a decent home. It does not mean, however, that gypsies and travellers should receive any preferential treatment; they are subject to the same legal restrictions, including those under planning legislation, as the settled community.

As at November 2016, the District had a total of 40 permanently-authorised and 7 temporarily-authorised gypsy and traveller sites, totalling 127 pitches and 15 pitches respectively. Only one of the sites, in Stanford Rivers (16 pitches), is in the public sector, and is managed by Essex County Council. The rest are on privately-owned land. 31 of the permanently-authorised sites, and all of the temporarily-authorised, are in Roydon and Nazeing.

The provision of caravan and mobile home sites for gypsies and travellers, on land not previously used for this purpose, is subject to the need for planning permission. However, apart from some of the towns and larger villages, the Epping Forest District lies entirely within the Metropolitan Green Belt, which has meant that there is a lack of immediately suitable land on which sites can be provided. This is because gypsy and traveller sites are classed as 'inappropriate development' in the Green Belt by the National Planning Policy Framework (NPPF). This has, in part, resulted in a number of unauthorised encampments, some of which have been 'tolerated', with enforcement action being taken on others.

The Council has previously dealt with issues relating to travellers reactively, considering planning applications as they arise. In addition, the Council has a housing responsibility to provide suitable accommodation for travellers who report as homeless. The Council is currently seeking to allocate sites for traveller pitches and travelling showpeople yards in the new Local Plan to meet the identified need as set out in the Essex Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTAA) July 2014 and 2016 update EFDC interim note. Consultation on the Draft Local Plan ended in December 2016, and includes provision to meet the need for 38 pitches to support the needs of the gypsy and traveller community and 1 yard to support the needs of travelling showpeople over the period of the Local Plan (2011-2033). In order to meet this need, the Draft Local Plan has allocated a number of sites - including provision within the strategic sites around Harlow and sites across the other settlements. In addition, the Draft Local Plan includes a policy to assess applications that may come forward on unallocated sites.

Gypsy and traveller accommodation – legislative requirements

The Housing Act 2004 requires local authorities to assess the needs of gypsies and travellers in the area and to develop strategies to meet the needs identified.

The Government's policy on sites for gypsies and travellers is set out in the Planning Policy for Traveller Sites (PPTS) 2015. This states that the Government's overarching aim is to ensure fair and equal treatment for travellers that facilitates their traditional and nomadic way of life, while respecting the interests of the settled community. The PPTS goes on to say that local authorities should 'make their own assessment of need for the purposes of planning' and advises that local authority local plans should:

- Identify (and update annually) specific deliverable sites to provide five years' supply against locally set targets;
- Identify a supply of specific developable sites, or broad locations of growth, for Years 6-10 and, where possible, Years 11-15 of the plan;
- Consider joint development plans on a cross-authority basis, to provide more flexibility on identifying sites;
- Relate the number of pitches to the circumstances of the specific size and location of the site and the surrounding population's density; and
- Protect local amenity and environment.

Gypsy and Traveller Accommodation Assessment (GTAA)

In order to make the assessment required by the PPTS, the Essex Planning Officers Association commissioned Opinion Research Services (ORS) to carry out a Gypsy and Traveller Accommodation Assessment (GTAA) on behalf of Essex local authorities. Their report, published in July 2014, revised and updated a previous GTAA that had been carried out in 2008. However, in August 2015, after the GTAA had been published, the Government changed the definition of 'traveller' in the PPTS to exclude gypsies and travellers that have ceased travelling.

This change in definition presented some difficulties for the Essex authorities that had participated in the GTAA, as it was strongly suspected that many of the gypsies and travellers that had been assessed as requiring accommodation would not meet the new definition.

ORS was therefore commissioned to carry out further work to provide updated GTAA figures under the new definition. In order to do this, ORS applied the principle that the new definition would only be met where gypsies and travellers still travelled (or had ceased to travel temporarily) for work purposes and, in doing so, stayed away from their usual place of residence.

ORS attempted to interview residents on all occupied pitches and plots, including any that were currently unauthorised. Residents on a significant number of the pitches (approximately 75%) chose not to be interviewed and ORS therefore extrapolated figures to account for them. The revised Essex-wide GTAA report has not yet been published, but the data analysis has been complete, so in order to inform the Draft Local Plan, the Council commissioned ORS to produce an 'Interim Briefing Note' containing the relevant data for the Epping Forest District. This was published in September 2016 and contains the overall updated assessment of need for the District.

The results of the updated assessment are shown in Table 9.1 below, which shows the requirement for pitches under the revised definition to be 38 additional pitches for gypsies and travellers and one additional travelling showperson's yard for the period of the Council's Local Plan (2011-2033). However, between 2011/12 - 2015/16, 16 gypsy and traveller pitches were completed, and a further four pitches currently have planning permission, meaning a net requirement of just 18 additional pitches and one additional travelling showperson's yard by 2033.

It should be noted that the provision of this number of additional pitches will not resolve the accommodation needs of gypsies and travellers that may have ceased travelling, but still identify as themselves as gypsies or travellers on the grounds of ethnicity (and may, therefore, have an aversion to living in 'bricks and mortar' dwellings). For most, the alternative of living on park home sites would not be an option, since plot sizes on these sites are generally insufficient for a home and any structures or vehicles that families use to pursue their traditional lifestyles.

The needs of these residents will therefore need to be assessed in the future, as part of the wider housing needs of the area, for example through the Strategic Housing Market Assessment (SHMA).

Interim Briefing Note - additional pitch requirements for Epping Forest District

The Interim Briefing Note projected the need for additional residential pitches in the District over the period 2011-2033 for gypsies, travellers and travelling show people as follows:

Table 9.1 Pitch requirements in the District (for travellers that meet the new definition)

Type/Period		Gypsies and Travellers	Travelling Show people
	Need 2011/12 to 2015/16	16	0
Paguiroment	Future requirement 2016/17 to 2020/21	16	
Requirement	Future requirement 2021/22 to 2025/26	2	1
	Future requirement 2026/27 to 2030/31	3	

Future requirement 2031/32 to 2032/33	1	
Total requirement 2011/12 to 2032/33	38	1
Already completed 2011/12 to 2015/16	16	0
Already permitted 2011/12 to 2015/16 (not yet completed)	4	0
NET REQUIREMENT to 2032/33	18	1

GTAA – requirement for short stay transit sites

There are currently no operational gypsy and traveller transit sites in Essex. In their 2014 GTAA report, ORS suggested that the provision of a transit site may address the significant number of unauthorised encampments that occur in the County. It was therefore their recommendation that there should be at least two transit sites in Essex, providing between 10 and 15 pitches each; ECC is currently trying to identify sites that might be suitable in terms of size and location.

Site licence conditions on permanent residential gypsy and/or traveller sites

The Council is required to issue licences on all authorised park homes sites in the District with conditions that adequately protect the health, safety and wellbeing of people residing at, or visiting, the sites. In September 2014, following a consultation with relevant partners - including gypsy and traveller communities - the Council agreed site licence conditions for permanent residential gypsy and traveller sites. The agreed conditions were broadly the same as those for other permanent residential park home sites, with some variations to take account of cultural and lifestyle differences between the two communities.

Enforcement of the site licence conditions rests with the Council, and a suitable partner is currently being sought to assist with this enforcement.

Key partners

- Department of Communities and Local Government
- Essex County Council
- Local councils
- Opinion Research Services

Housing in the Private Sector

Aim

To provide good quality housing in the private sector through the provision of advice and assistance, including financial assistance where appropriate, and to ensure that minimum housing standards are met through positive engagement with owners and landlords, taking enforcement action where necessary.

Objectives

- a) Take action to ensure that the condition of privately rented accommodation meets the standards required by legislation and good practice;
- b) Deal with complaints of harassment and illegal eviction to ensure that tenants can live safely in their homes and to take enforcement action against landlords where necessary;
- Pro-actively identify, survey and license all houses in multiple occupation (HMOs) and take appropriate action to ensure adequate

- standards are met for fire safety, provision of amenities, management, repair and occupancy levels;
- d) License any new park home sites and carry out annual site inspections of all existing sites, to ensure compliance with site licence conditions; and
- e) Work with the horticultural industry to ensure living conditions for on-site worker accommodation are safe and to an acceptable standard for permanent occupation.

Key issues

Private renting

The number of people renting in the private sector is increasing nationally and locally. The high cost of buying a home and the shortage of social housing means many families have to rent privately in the medium to long-term. There are now more than 9 million people renting privately in England; the private rented sector makes up 18 per cent of all households in England. Nearly 50% of the growth in the private rented sector in the last two years has come from families with children and almost half of tenants are aged 35 years and over.

The Office for National Statistics (ONS) data for 2011 shows that 11% of Epping Forest District Council residents live in privately rented accommodation, which is less than the national average. Assuming the District is following national trends, this figure is likely to increase in the years ahead.

The Council's last Private Sector House Condition Survey undertaken in 2011 estimated that around 50% of properties in the private rented sector and around 21% of owner-occupied

properties did not meet the Government's Decent Homes Standard. It was also estimated that around 24% of privately rented and around 11% of owner-occupied properties have at least one significant hazard under the national Housing Health and Safety Rating System (HHSRS) that is likely to affect the occupier's health and safety.

With the increasing demand for private renting, it is important to try to ensure that property conditions in the private rented sector are as good as possible and at least meet minimum standards to protect the health and safety of occupiers, many of whom are vulnerable.

The Council responds to complaints from tenants about their property conditions and enforces standards where necessary. Enforcement action is always carried out in accordance with the Regulators' Code and the Council's Private Sector Housing Enforcement Policy. The Council's current Private Sector Housing Enforcement Policy was last updated in September 2015.

The Housing and Planning Act 2016 introduces new enforcement tools for local authorities to improve conditions in the private rented sector and, in particular, to deal with rogue landlords and lettings agents that flout the law. This includes the introduction of civil penalty notices as an alternative to prosecution. Therefore, the Council will be updating its Private Sector Housing Enforcement Policy in the near future. A staged approach is taken to enforcement wherever possible, to ensure that solutions are initially sought through advice, co-operation and agreement. However, where this is not successful, some cases require formal action, which may ultimately lead to prosecution or other summary action.

On average, the Council responds to around 280 complaints each year from tenants regarding their property conditions, which generally result in formal action being taken in around 10 cases each year.

The Council wants to work proactively with landlords. Therefore, a survey was carried out in 2016 with all known private landlords operating in the District to establish how best to keep them informed and updated on relevant issues. The survey revealed that 53% of landlords own only one or two properties and nearly 40% considered themselves to be inexperienced landlords. The Council intends to introduce a new service shortly to enable landlords to access an online resource of information on topical issues such as new legislative requirements and be signposted to other websites for additional information.

Harassment and illegal eviction

The overwhelming majority of landlords are reputable and behave in a professional manner. However, there are a small proportion of landlords who neglect their properties and exploit their tenants. While good landlords can have an extremely positive impact on the lives of their tenants, the small minority of bad landlords can have an equally negative impact.

The Council tries to address complaints of harassment and illegal eviction from tenants about their landlords. These complaints are taken very seriously and the penalties on successful prosecution include a heavy fine and possible imprisonment. Most cases can be resolved informally, so that the tenant can remain safely in their home but, on rare occasions, the matter is escalated and enforcement is necessary.

Houses in multiple occupation (HMOs)

As the availability of affordable housing becomes further stretched, more people (including families) are looking towards living in shared accommodation, such as bedsits. Houses in multiple occupation (HMOs) tend to attract the most vulnerable people and the

accommodation often tends to be of relatively low quality - because it involves some sharing of amenities (such as washing, toilet and kitchen facilities) and relies on good landlord management, which is not always in place. It is recognised nationally that a small but significant number of 'rogue' landlords exploit their tenants by renting sub-standard and dangerous accommodation to vulnerable tenants, sometimes in overcrowded conditions.

The Government is committed to raising standards in HMOs and, later in 2017, proposes to extend the existing mandatory licensing scheme that currently tackles the highest risk HMOs (being 3 storeys or more), to include all HMOs occupied by five or more people living as two or more households. Licensing is an effective tool for controlling the standards in HMOs to ensure that there are adequate amenities for the number of occupiers and fire safety measures in place and to limit the number of occupiers to prevent overcrowding.

Currently there are only 13 licensed HMOs in the District. A programmed survey of possible HMOs is currently being carried out to determine those properties that require a licence under the existing regime, but have not applied for one, and those properties that do not currently require a licence, but will need to apply for one when the new licensing regime is introduced.

It is an offence to operate a licensable HMO without a licence or, where an HMO is licenced, for the property to be in breach of one or more licence conditions. Enforcement action will be taken against landlords that are found to be operating a licensable HMO without a licence and who do not then take the appropriate steps to ensure their property is appropriately licenced.

In view of the significantly increased numbers of HMOs that will need to be licenced, and breaches enforced, increased number of environmental health officers will be required, funded from the increased income received from the charges that the Council is able to make for its licensing functions.

Park home sites

There are currently seven commercially-run residential park home sites in the District. The Council has a licensing function to ensure the health, safety and welfare of residents on the sites and also to protect them from any harassment or illegal eviction by site owners.

Park homes are commonly occupied by older people who have downsized to smaller, more affordable, housing. The Mobile Homes Act 2013 was introduced to address the problem that a small, but significant, number of site owners nationally were abusing their power to take advantage of, and discriminate unfairly against, certain residents - particularly those that were older and more vulnerable.

The Act introduced a number of important provisions to be enforced by local authorities against site owners, including:

- Strengthening the councils' harassment powers in relation to withdrawing or withholding services;
- Making it an offence to unfairly block the sale of a home to a potential purchaser;
- Simplifying the enforcement procedure for local authorities where a breach of a site licence condition occurs; and
- Introducing the requirement that site rules, where they exist, are fair, non-discriminatory and are only introduced following a full consultation with residents.

The Act also allows local authorities to charge for this licensing function and the Council has a fee-charging regime based on the size of the park home site. A charge is made for any new site licence applications but, more importantly, an annual fee is chargeable to existing sites (depending on site size) which covers the costs of a full annual site inspection and the time taken dealing with complaints regarding site conditions that may occur during the year.

Nursery worker accommodation

Employees on horticultural nursery sites in the District often live and work on the sites for the growing season, in temporary accommodation, before leaving to work elsewhere in the winter months. However, concerns have arisen that some people are living and working on sites permanently (in breach of planning rules), including families with young children, in accommodation that is poor and unsafe.

The Council undertook a survey in 2015, which involved carrying out site inspections and interviewing site owners and occupiers where possible. It was found that 59 of the 73 commercial growing sites identified had employees that also lived in accommodation on site, on a permanent basis – with several sites that included families with young children.

The type of accommodation varied but, typically, the worst conditions were most commonly found in holiday-style caravans that presented issues such as severe risks of fire and explosion, electrocution, excess cold, insanitary drainage and poor drinking water quality. There were also concerns around overcrowding and the safety of young families living in inadequate accommodation on commercial sites.

In response, the Council set up a Nursery Worker Accommodation Task Group, bringing together existing services involved with the nursery worker community, to address a number of issues including:

- The Council's longer term planning objectives for the industry, for inclusion in the District's new Local Plan;
- Bringing the accommodation, amenity and environment for nursery employees and their families up to an acceptable standard; and
- Significantly improving the drinking water and drainage supply to the sites which, in many cases, is seriously defective.

A consultation exercise has taken place on local accommodation standards proposed by the Council and there has been a meeting between representatives of the Council, Lea Valley Growers Association, National Farmers Union and a small number of site owners to discuss how the requirements regarding planning, accommodation standards (including drinking water supply and drainage provision) can best be met within reasonable timescales.

The long-term objective is to work with the industry to agree an acceptable standard of accommodation for the permanent occupancy of workers on the nursery sites. In the meantime, the Council will continue to monitor conditions and enforce improvements if it is found that conditions are such that residents' health and safety is at serious risk.

Discretionary housing assistance

In addition to Disabled Facilities Grants, the Council provides discretionary financial assistance to private sector residents by way of:

- Decent Homes Repayable Assistance means tested, repayable grants of up to £10,000 for work to bring properties up to the Decent Homes Standard. Applicants must be:
 - At least 60 years of age;
 - Chronically sick or disabled; or
 - o Be a household with dependent children.
- Small Works Repayable Assistance means tested, repayable grants of up to £3,000 (to the same category of people as for Decent Homes Repayable Assistance) for work to:
 - Rectify a significant hazard under the Housing Health and Safety rating System (HHSRS);
 - Rectify any disrepair likely to damage the fabric of the property; or
 - o Improve thermal comfort.
- Empty Homes Repayable Assistance (EHRA) loans of up to £10,000 (repayable on sale or disposal) to owners of long-term empty properties that intend to reside in the property themselves.

The types of assistance available and the eligibility criteria of each are set out in the Housing Assistance Policy 2015-2017.

Fuel poverty

The Council carried out a Private Sector House Condition Survey in 2011 which indicated that 14% of occupiers in the private sector in the District were in 'fuel poverty'. At that time, the definition of fuel poverty applied to occupiers of dwellings where 10% of their net household income would need to be spent to give an adequate provision of warmth and hot water.

The Government's definition of fuel poverty changed in 2013 to households that have to spend more than a median amount on fuel to keep their home at a reasonable temperature and if spending that amount puts their remaining income below the poverty line.

Although it is considered, nationally, that there has been a reduction in the number of fuel-poor households under the new definition, the Council has no current data on the numbers and locations of fuel-poor households in the District. Without this data, it will be impossible to take a targeted approach to meet the Government's objective of ensuring that as many homes as is reasonably practicable achieve a minimum energy efficiency rating of B/C by 2030.

The Council is therefore undertaking a desktop exercise to collect information, which will hopefully result in a source of data from which fuel-poor households can be identified, and targeted, in order to improve their ability to heat their homes at reasonable cost.

Key partners

- Essex County Fire and Rescue Service
- Essex County Council
- Lea Valley Growers Association and National Farmers Union
- West Essex Clinical Commissioning Group

Chapter 11

Empty Homes in the Private Sector

Aim

To bring long-term empty properties back into use and, in so doing, increase the supply and range of housing, enhance the environment, help tackle homelessness and help reduce anti-social behaviour.

Objectives

- a) Make effective use of information on empty homes within the District;
- Maintain effective partnership working within the Council and with external partners to support empty homes initiatives;
- Raise awareness of the issues associated with empty homes in the District and encourage action to bring them back into use;
- d) Offer financial assistance where applicable to renovate empty properties so that they are in a condition suitable for occupation;
- e) Enhance the character of the local community through the improvement and re-use of empty homes; and
- f) Take enforcement action to bring empty homes back in to use, where appropriate and where resources permit.

Key issues

Introduction

Recent governments and the Council have recognised the value of reducing the number of empty properties, as part of an overall ambition to provide additional homes.

In order to achieve this, various incentives and options have been introduced nationally, to encourage local authorities to take positive action. These include the New Homes Bonus (which rewards councils for bringing empty properties back into use) and allowing councils local flexibility to charge up to 50% extra council tax on property that has been unoccupied and unfurnished for two years or more.

This, together with an upturn in the housing market following the financial crisis in 2008, has contributed to a marked reduction in empty properties both nationally and locally. The official statistics on empty homes for England show that the recorded figures for the total number of empty homes peaked in 2008 at 783,119 but dropped to 448,999 by 2015.

The Council maintains a database of empty homes using information from council tax and other areas of the Council, supported by information from owners and other individuals. This information is used to prioritise empty homes for action where required. This data shows a similar downward trend locally in the District, as shown in Table 11.1 below.

Table 11.1 Total numbers of empty homes in Epping Forest District (2008-2017)

Status	2008	2014	2015	2 017
All empty homes	1,500	1,391	607	706
All long-term empty homes (for more than 6 months)	611	431	347	436
Empty more than two years	Not recorded	124	122	129

The Council seeks to effectively publicise the opportunities there are to help bring empty properties back into use and to encourage property owners to take these up. Communities are also made aware of the role that the Council can play.

Approach to service delivery

In order to develop an effective strategy for dealing with empty properties, it is important to understand why properties are left empty for long periods of time, so that time and resources can be better directed to tackle those issues that prevent homes being returned to use more quickly.

Common reasons why properties are not returned to use when they are empty have been identified (both nationally and locally) as:

- A previously rented property now needs refurbishment before it can be let again and the landlord is unable to finance this;
- A property has been inherited on the death of the owner and it has not been possible to reach a decision quickly on what to do with it;
- Properties that have been bought to refurbish and the work is taking a long time to complete;
- Properties that are being held empty as an investment or to pass on to their children.
 There are some very high value properties in the District that have been empty for more than two years;
- The property owner has died but probate has not been granted for a variety of reasons (such that it is not being progressed because it is not in the financial interest of the person that will inherit the estate); and
- Flats over commercial units can be difficult to occupy by anyone other than the owner of the commercial element, either for security reasons (for example, a pharmacy) or suitability (such as a pub). However, if the owner resides elsewhere, the flat stays empty.

While it is recognised that any empty property can be a problem, and therefore all owners of long-term empty properties should be pursued, it is sensible to concentrate limited time and resources on those properties that have been empty for the longest time.

Evidence shows that a significant number of properties in the District identified as long-term empty (i.e. those that have been empty for six months), come back into use within two years. Therefore, in considering the Council's priorities for action, the focus of more significant work is on those properties that have been empty for more than two years, or are the subject of

complaint. In these cases, the Council risk-assesses properties to produce a target list for focused action based on an annual process of prioritisation.

The aim to reduce the number of empty properties must be balanced against the fact that it is not an offence to leave a property empty. In the first instance, the Council's strategy is to try and engage with property owners in a positive and co-operative way to encourage them to return their property to use, helping them find solutions and offering financial support where appropriate. This may be through:

- The Council's PLACE (Private Leasing Agreements to Convert Empties) Scheme which
 is administered by a consortium of 5 local authorities, including the Council. The Scheme
 provides financial assistance to owners of long-term empty properties that need
 renovation before they can be brought back in to use; or
- Empty Homes Repayable Assistance which is a loan provided by the Council, of up to £10,000 (repayable on sale or disposal), to owners of long-term empty properties that intend to reside in the property themselves.

However, the Council will take enforcement action where the consequences of the property being left empty may give rise to issues that justify this. The process followed is set out in the Council's Housing Service Strategy on Empty Homes in the Private Sector. Enforcement action is always carried out in accordance with the Regulators' Code and the Private Sector Housing Enforcement Policy, which is regularly updated.

Empty homes are prioritised for action if they are problematic in their local neighbourhoods (e.g. through anti-social behaviour) and could meet particular housing need;

Types of enforcement action considered are:

- Compulsory Purchase Orders local authorities have the power to acquire land and property compulsorily where the owner is not willing to sell by agreement.
- Empty Dwelling Management Orders (EDMOs) allow local authorities to take management control of certain empty properties for a period of up to seven years during which time the owner retains ownership.
- Enforcing improvements to the property various statutory provisions (such as the Housing Act 2004) are available where a property is defective or causing nuisance to others. The action may not in itself lead directly to the property being brought back into use but it may focus the mind of the owner.
- Enforced Sale the Law of Property Act 1925 gives local authorities the power to enforce
 the sale of a property on which it has a registered debt. The debt is recovered from the
 proceeds of the sale.

Key partners

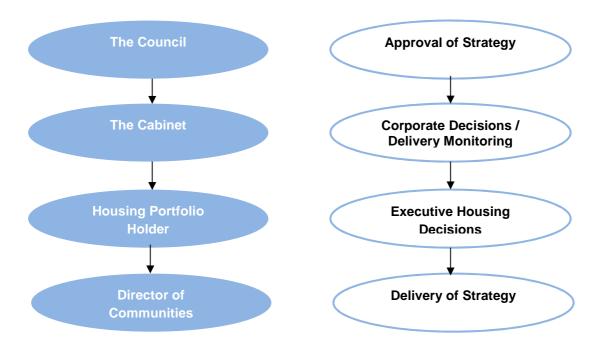
- Consortium for the PLACE Scheme (Chelmsford City Council, Harlow Council, Uttlesford District Council, East Herts District Council and Hertsmere Borough Council)
- Genesis Housing Association

Chapter 12

Monitoring delivery of the Strategy

Framework for delivering the Strategy

In view of its strategic importance, this Housing Strategy was adopted by the Council's Cabinet, following pre-scrutiny by the Council's Communities Select Committee. However, responsibility for the delivery of the strategy rests with the elected Housing Portfolio Holder and the Director of Communities. The decision-making hierarchy can be summarised as follows:



Key Action Plans

An important part of this Housing Strategy is its Key Action Plan. The Housing Strategy's first Key Action Plan is attached as an Appendix.

For each of the actions, the Action Plan sets out:

- The relevant category;
- The person responsible; and
- Target date for completion.

Subsequent Key Action Plans will be produced on an annual basis and will be approved by the Housing Portfolio Holder, on the recommendation of the Communities Select Committee, who will consider the Draft Key Action Plan in detail.

Reviewing and monitoring the Housing Strategy and Key Action Plan

Progress on the Housing Strategy Key Action Plans will be formally monitored by the Communities Select Committee every six months.

The Housing Strategy itself will be reviewed during 2022, or earlier if the need for significant revisions is identified.

Appendix

Housing Strategy Key Action Plan 2017-18

No	Category	Action	Responsibility	Timescale
1	Local Plan	Produce a Housing Implementation Strategy to show how the Council will manage the delivery of new housing in the District	Assistant Director (Planning Policy)	June 2018
2	Local Plan	Start the development of Strategic Masterplans for relevant sites across the District to guide housing mix and composition to ensure sustainable communities in line with Draft Local Plan Policy	Assistant Director (Planning Policy)	July 2018
3 T	Local Plan	Set up mechanisms for the achievement of high quality design of new residential developments, including the Quality Review Panel	Assistant Director (Planning Policy)	July 2018
Page ₄ 91	Local Plan	Complete Stage 2 of the District-Wide Viability Assessment to determine a viable level of affordable housing provision within future developments.	Assistant Director (Planning Policy) / Director of Communities	November 2017
5	Local Plan	Publish a "Regulation 19" Pre-Submission Draft Local Plan for representations.	Assistant Director (Planning Policy)	February 2018
6	Local Plan	Prepare for the submission of the Final Local Plan to the Planning Inspectorate for Independent Examination.	Assistant Director (Planning Policy)	June 2018

No	Category	Action	Responsibility	Timescale
7	Local Plan	Work in partnership with Epping Town Council and a development partner to commence a regeneration scheme for the St Johns Area of Epping, which includes an appropriate amount of market and affordable housing.	Director of Neighbourhoods	September 2018
8	Local Plan	Develop and promote the Council's Self and Custom Build Register and work in partnership with East Herts, Uttlesford and Harlow Councils to pool Community Housing Funding from the Government, to undertake a joint project to consider all aspects of community-led housing, including self and custom build and Community Land Trusts	Director of Communities	July 2018
Page 92	Local Plan	Appoint a new Affordable Housing Officer for an initial 3-year period, to provide additional capacity to respond to increased planning applications for affordable housing as a result of the Local Plan and to undertake the additional work to develop the Council's approach to self and custom build housing	Director of Communities	July 2018
10	Affordable Housing	Work with housing associations and developers to complete the development of 175 new affordable homes, with planning permission, for rent and shared ownership at the following non-Council owned sites: (a) Knollys Nursery, Waltham Abbey (b) Fyfield Research Park, Ongar (c) Hillhouse Independent Living Scheme, Waltham Abbey (d) Barnfield, Roydon (e) Stoneshot Farm, Waltham Abbey (f) Netherhouse Farm, Sewardstone (g) Happy Grow Garden Centre, Thornwood (h) Institute Road, Coopersale (i) Esperanza Nursery, Stapleford Abbotts 10 homes 11 home	Director of Communities	September 2018

No	Category	Action	Responsibility	Timescale
11	Affordable Housing	Re-tender the contract for the provision of specialist affordable housing viability advice.	Director of Communities	March 2018
12	Affordable Housing	Review and revise the Council's Tenancy Policy to implement the introduction of 5-year fixed term tenancies for all new tenants, to meet the requirements of the Housing and Planning Act 2016 and subsequent Government Guidance.	Assistant Director (Housing Operations)	July 2018
13 Page	Affordable Housing	Review and revise the Council's Housing Allocations Scheme, to ensure that Council and housing association accommodation continues to be targeted at those assessed as being in the most need	Assistant Director (Housing Operations)	July 2018
ge 43	A (Increase the number of Preferred Housing Association Partners, to ensure that there is a sufficient number of social landlords operating in the District to deliver the number of affordable homes required by the Local Plan.	Director of Communities	December 2017
15	Affordable Housing	Prepare for the sale of "high value" Council properties to fund the proposed levy to the Government to meet the requirements of the Housing and Planning Act 2016.	Assistant Director (Private Housing & Communities Support)	April 2018

No	Category	Action	Responsibility	Timescale
16	Affordable Housing	Continue to work with Hastoe Housing Association and Parish Councils to investigate the development potential for rural housing schemes in villages, through the Council's Rural Planning Exceptions Policy.	Director of Communities	September 2018
17	Council Housebuilding	Complete the development of 51 new affordable homes for rent at Burton Road, Loughton, under Phase 2 of the Council's Housebuilding Programme.	Assistant Director (Housing Property & Development)	June 2018
18 Pa(Council Housebuilding	Complete the development of 34 new affordable homes for rent at North Weald, Ongar, Epping and Coopersale, under Phase 3 of the Council's Housebuilding Programme.	Assistant Director (Housing Property & Development)	September 2018
18 Page 94 19	Council Housebuilding	Market and sell the Council-owned development site at Pyrles Lane Nursery, Loughton with a requirement that the required 40% affordable homes are sold to the Council on practical completion for letting to applicants on the Council's Housing Register.	Assistant Director (Housing Property & Development)	March 2018
20	Council Housebuilding	Obtain additional loans from the Public Works Loan Board to fund Phases 4-6 of the Council Housebuilding Programme.	Director of Resources	March 2018

No	Category	Action	Responsibility	Timescale
21	Homelessness	Undertake a pilot scheme to provide 3 modular units of temporary accommodation at Norway House, North Weald to accommodate 6 single vulnerable homeless households and review the success of the pilot scheme after 12 months' occupation.	Director of Communities	Pilot Scheme – December 2017 Review – December 2018
22	Homelessness	Review the success of placing 3 homeless households at Zinc Arts, Ongar, for a trial period to consider if further placements should be made for homeless households.	Assistant Director (Housing Operations)	September 2017
23	Homelessness	Review the level of staffing resources required to meet the new duties of the Homelessness Reduction Act 2017.	Assistant Director (Housing Operations)	March 2018
Page 95	Homelessness	Produce a new Draft Homelessness Strategy, ready for consultation.	Assistant Director (Housing Operations)	March 2018
25	Homelessness	Identify and commission an appropriate organisation to arrange for support workers to visit rough sleepers, provide advice and arrange short term night shelter accommodation.	Assistant Director (Housing Operations)	October 2017
26	Homelessness	Increase the staffing levels at Norway House, the Council's Homeless Persons Hostel in North Weald, by 0.5FTE to assist with increased workloads and improved on-call coverage.	Housing Options Manager	September 2017

No	Category	Action	Responsibility	Timescale
27	Homelessness	Undertake a further review of the Council's Flexible Homelessness Support Grant, to ensure that it is used to meet the highest priorities of need	Assistant Director (Housing Operations)	December 2017
28	Homelessness	Consider the provision of shorter (2-year) non-secure fixed term tenancies to homeless households accommodated in Council properties, with a clear requirement for the tenants to find alternative accommodation during the tenancy period, as part of the review of the Housing Allocations Scheme	Assistant Director (Housing Operations)	July 2018
Page 96	Supported Housing - Older & Other Vulnerable People	Progress the Key Action Plan from the Council's study into the Impact of an Ageing Population in the Epping Forest District.	Assistant Director (Community Services & Safety)	July 2018
30	Supported Housing - Older & Other Vulnerable People	Undertake a review the Council's sheltered housing assets with a view to remodelling or redeveloping sheltered housing sites that are no longer fit for purpose.	Director of Communities	March 2018
31	Supported Housing - Older & Other Vulnerable People	Undertake a review of the Council's Sheltered Housing Service in order to determine the most appropriate approach to future delivery.	Assistant Director (Housing Operations)	July 2018

No	Category	Action	Responsibility	Timescale
32	Supported Housing – Older & Other Vulnerable People	Include a policy in the Local Plan that requires all new homes on housing developments in the District to be accessible and adaptable as defined by the Building Regulations in effect at the time of the application.	Assistant Director (Planning Policy)	September 2018
33	Supported Housing - Older & Other Vulnerable People	Include a policy in the Local Plan that supports proposals for housing specifically designed to meet the identified needs of people with support needs where they meet a proven identified need.	Assistant Director (Planning Policy)	September 2018
34	Supported Housing - Older & Other Vulnerable People	Work with Essex County Council to facilitate the provision of a new Independent Living (Extra Care) scheme for older people at Hillhouse, Waltham Abbey, comprising both market housing and affordable rented homes.	Director of Communities	September 2018
Page 97	Gypsies and Travellers	Ensure that the Local Plan includes provision for a sufficient number of additional pitches for gypsies and travellers, in accordance with the assessed need from the Interim Briefing Note on Additional Pitch Requirements for the Epping Forest District.	Assistant Director (Planning Policy)	June 2018
36	Gypsies and Travellers	Seek a suitable partner to undertake the enforcement of site licence conditions on permanent residential gypsy and traveller sites.	Assistant Director (Private Housing & Communities Support)	March 2018
37	Private Sector Housing	Deliver the Action Plan formulated by the Nursery Workers Accommodation Working Party and consider and adopt a corporate protocol for dealing with unsuitable living conditions within agricultural and nursery accommodation, from a housing, planning, legal and economic development perspective.	Assistant Director (Private Housing & Communities Support)	June 2018

No	Category	Action	Responsibility	Timescale
38	Private Sector Housing	Introduce a new service to provide an on-line resource of information on topical issues for private landlords.	Private Housing Manager (Technical)	March 2018
39	Private Sector Housing	Prepare for the Government's proposed extension of the mandatory licensing scheme for houses in multiple occupation (HMOs), including the recruitment of sufficient additional environmental health officers to respond to the increased workload.	Assistant Director (Private Housing & Communities Support)	June 2018
₄ Page	Private Sector Housing	Undertake a desktop exercise to provide a source of data to identify and target fuel-poor households, to provide information on improving their ability to heat their homes at a reasonable cost.	Assistant Director (Private Housing & Communities Support)	June 2018
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For alternative formats contact housinginfo@eppingforestdc.gov.uk, 01992 564041

May 2017

Report to the Cabinet

Report reference: C-007-2017/18
Date of meeting: 11 July 2017



Portfolio: Finance

Subject: Local Council Tax Support Scheme 2018/19

Responsible Officer: Janet Twinn (01992 564215).

Democratic Services Officer: Gary Woodhall (01992 564470).

Recommendations/Decisions Required:

(1) That a public consultation exercise on the 2018/19 scheme be undertaken between August and October 2017; and

- (2) That the following elements of the scheme be approved for consultation purposes:
 - (i) the acceptance of the general principle that the Local Council Tax Support scheme for 2017/18 should aim to be cost neutral for the Council;
 - (ii) to seek views on alternative funding options for the Local Council Tax Support scheme if the scheme was not cost neutral;
 - (iii) the disregard of Bereavement Support Payment in the calculation in line with other Welfare Reforms;
 - (iv) the introduction of technical changes relating to the assessment of Universal Credit income to allow for Local Council Tax Support to be awarded for a fixed period of six months before a review was undertaken; and
 - (v) a revision to the scheme in order to prevent an excess council tax discount being awarded, that would enable Epping Forest District Council, where appropriate, to decide the income to use in the calculation irrespective of any notification from the Secretary of State for Work & Pensions.

Executive Summary:

On 20 December 2016, Council adopted the Local Council Tax Support scheme for 2017/18. Consideration now has to be given to the scheme for the financial year 2018/19 which will require approval by full Council in December 2017.

It is necessary to undertake public consultation on the Council's scheme each year before the scheme is adopted by Council. In view of the timescales, it will be necessary for the consultation to be undertaken between August and October 2017 in order to ensure that the Authority will have consulted correctly and that Council can adopt the scheme at the December meeting.

Reasons for Proposed Decision:

The judgement given in the case of R v London Borough of Haringey on 29 October 2014, highlighted the requirement for Local Authorities to consult on their scheme annually, whether they intend to make any changes to their Local Council Tax Support scheme or not. The judgement also made clear that in their consultation, Local Authorities also needed to consult on how the scheme is to be funded. Respondents should be given the opportunity to give their views on whether the scheme should be cost neutral, or, if not, whether the scheme should be funded by making changes to the scheme, increasing the Council Tax, cutting other Council services, or using Council reserves. The Council's scheme must be agreed by full Council and be in place by 31 January 2018.

In view of the timescales, consultation needs to be undertaken between August and October 2017. If consultation is commenced later, it will not be possible to complete the consultation and make any amendments to the scheme in time for a further report to Cabinet on 7 December 2017.

Other Options for Action:

Cabinet could either decide not to carry out a consultation exercise for the 2018/19 Local Council Tax Support scheme, or that consultation should only be carried out on potential changes to the scheme, not the funding of the scheme. However, bearing in mind the judgement in R v London Borough of Haringey, the Council could be judicially reviewed.

Report:

Local Council Tax Support schemes

- 1. Local Council Tax Support (LCTS) replaced Council Tax Benefit with effect from 1 April 2013. People of pension age continue to be protected from adverse changes as required by the Government, although the Government can introduce legislation to change the scheme for people of pension age. Every Local Authority must then amend their scheme to reflect the legislative changes. For people of working age, the Council has adopted a scheme which has the following key elements which are different to the scheme for people of pension age:
 - The calculation of support is based on 75% of the Council Tax bill, rather than 100%.
 - The calculation of support is based on a maximum of a band D property. This means that anyone of working age that lives in a property with a Council Tax Band of E, F, G, or H, has their support calculated as if their property was a band D.
 - Inclusion of child maintenance in the calculation with a disregard of £15 per week (per family). This is income that is received into a household that may not be available to other households that pay the same amount of Council Tax.
 - The capital limit is £6,000, so those with capital exceeding £6,000 are required to make full payment of their Council Tax liability.
 - A Minimum Income Floor for claimants who are self-employed (from April 2016).
 Where the declared income from self-employment is less than the National Living Wage, income is assessed using the National Living Wage instead. This is in line with other welfare reforms.
 - The Exceptional Hardship Scheme for LCTS is intended to support people whose individual circumstances mean that their Council Tax liability is causing them exceptional hardship.

2. The scheme was designed to take into account the ability to pay and the collectability of the resultant Council Tax liability. Across Essex, annual collection rates have been higher than originally anticipated, which is due partly to the caseload decreasing as the economy recovers, but also due to the proactive work that Officers have undertaken with people affected by the Local Council Tax Support scheme. Council Tax Officers have been proactively contacting people and have set up special arrangements to help people who do not receive their income on a monthly basis. The scheme design has been successful to date.

Consultation for 2018/19

- 3. In view of the judgement in R v London Borough of Haringey, it is clear that consultation is required whether changes are to be made to the scheme or not. Although at present, it is not proposed to make any major changes to the scheme for 2018/19, there are some potential changes which should be considered and therefore it is recommended that consultation is undertaken on these issues.
- 4. If it becomes necessary to make further cuts to the expenditure on Local Council Tax Support, the maximum Support payable for people of working age could be reduced from 75% to a percentage that would achieve the required savings. However, although collection rates have been better than expected, if the scheme is changed and people have to pay more, there will become a point at which collection rates will significantly reduce as the liability becomes too much and people stop paying altogether. Consultation will be required on this particular aspect of the scheme, together with options for alternative funding arrangements, rather than making savings through the scheme itself.
- 5. From 6 April 2017, Bereavement Support Payment is a new benefit which replaces the old bereavement benefits system for people who are under state pension age. It may be paid to a surviving spouse or civil partner and consists of an initial lump-sum followed by up to 18 monthly instalments. For Housing Benefit purposes, the monthly Bereavement Support Payments are disregarded as income and the lump sum payment is disregarded as capital for 52 weeks. If this disregard is to be replicated in the Local Council Tax Support scheme, consultation will be required.
- 6. As Universal Credit is rolled out nationally, the administrative burden of calculating Local Council Tax Support entitlement for recipients of Universal Credit becomes greater. Universal Credit is reassessed on a monthly basis so there is the potential that an LCTS award based on Universal Credit could change every month necessitating the issue of a new council tax bill every time. If this were to happen, it would make the recovery of unpaid council tax very difficult as, with each monthly recalculation, the recovery process would have to be restarted and it would be virtually impossible to progress beyond the reminder stage of the recovery cycle. It is therefore proposed to consult on making an award of LCTS to a recipient of Universal Credit, for a fixed period of 6 months, regardless of changes in Universal Credit income during that period. At the end of 6 months, the LCTS will be recalculated by using the average weekly amount of Universal Credit received during the previous 6 months. A new award will then be fixed for the following 6 months and so on. At present there are only 33 households receiving LCTS and Universal Credit but this number will increase as the roll out of Universal Credit full service accelerates.
- 7. Another proposed amendment that will require consultation is the ability for the Council to disregard an award of a DWP administered benefit when we know that the award of that benefit was incorrect. For example, there have been cases when the DWP have awarded Income Support to a single parent and yet that claimant has admitted to us that they live with a partner who works, or a case when Guaranteed Pension Credit was awarded when the claimant was not of state pension age. In circumstances like these, we are currently bound by the DWP decision and have had to award maximum LCTS. A change to the

wording from 'shall' to 'may' will allow the Council to disregard decisions made by the DWP where we know that they are incorrect.

- 8. The Essex Authorities have continued the joint work that they have carried out to implement their schemes for the last five years. Meetings take place on a monthly basis and ECC regularly attend these meetings. Although the Police and Fire Authorities are invited, they rarely attend because ECC act as their representative and they are sent minutes of these meetings. In this way, the requirement to consult with major precepting Authorities is met.
- 9. It is proposed to carry out public consultation for the 2018/19 scheme between August and October 2017. Essex County Council have previously hosted the on-line consultation for the Essex Authorities and it is hoped that they will also agree to host the on-line consultation for 2018/19. For anyone who does not have access to the internet, the ability to respond in paper format will be made available.

Resource Implications:

The cost of consultation on the Local Council Tax Support scheme for 2018/19 will be met from existing budgets.

Legal and Governance Implications:

There is a requirement for consultation to be undertaken on the Council's Local Council Tax Support scheme each year.

Safer, Cleaner and Greener Implications:

There are no specific implications.

Consultation Undertaken:

Consultation has been undertaken with ECC and the Fire and Police Authorities through the regular meetings with the Essex Benefit Managers. The proposed amendments and funding arrangements for the scheme will be subject to public consultation as set out in this report.

Background Papers:

Report to Council 20 December 2016.

Risk Management:

Risk register

A risk register was produced as part of the process for devising the Local Council Tax Support scheme. It has not been necessary to make any amendments.

Caseload growth risk

If more people become eligible to claim LCTS e.g. because of economic downturn, then the cost of the scheme will increase. However caseload has been reducing as the economy has improved.

Collection risk

If there is a reduction in the maximum percentage of Council Tax liability that is eligible for Local Council Tax Support, the impact of the scheme is that low income working age households have to pay a proportion of their Council Tax liability. Inevitably there will be bad

debts but the collection rate has been higher than anticipated. However, there will be a point where people are asked to pay more Council Tax, therefore making the liability too high for them, that they will not make any payments at all.

Funding reduction risk

The Local Government Finance Settlement will reduce again in 2018/19. This could lead to either making changes to the LCTS scheme to reduce expenditure or to make savings elsewhere, either from Council budgets, increasing the Council Tax or using Council reserves.

Precept increase risk

LCTS costs will increase if any of the precepting Authorities increase their Council Tax.

Equality Analysis:

The Equality Act 2010 requires that the Public Sector Equality Duty is actively applied in decision-making. This means that the equality information provided to accompany this report is essential reading for all members involved in the consideration of this report. The equality information is provided as an Appendix to the report.





Equality analysis report

Use this report template to record your equality analysis. This report is a written record that demonstrates that you have shown *due regard* to the need to **eliminate unlawful discrimination**, **advance equality of opportunity** and **foster good relations** with respect to the personal characteristics protected by equality law. Due regard must be paid at formative stages of policy or service development, changes, or withdrawal.

To assist you in completing this report, please ensure you read the guidance notes in the Equality Analysis Toolkit and refer to the following Factsheets:

- Factsheet 1: Equality Profile of the Epping Forest District
- Factsheet 2: Sources of information about equality protected characteristics
- o Factsheet 3: Glossary of equality related terms
- o Factsheet 4: Common misunderstandings about the Equality Duty
- Factsheet 5: Frequently asked questions
- Factsheet 6: Reporting equality analysis to a committee or other decision making body

If you require further help, please contact the Performance Improvement Unit.

Step 1. About the policy, service change or withdrawal

Name of the policy, service or project: be specific	Local Council Tax Support scheme	
Revised / new / withdrawal:	Revised	
Intended aims / outcomes/ changes:	Up to date assessment of impact to support the Local Council Tax Support policy	
Name of senior manager for the policy / project:	Janet Twinn	
Name of policy / project manager:	Bob Palmer	

Step 2. Decide if the policy, service change or withdrawal is equality relevant

Does the policy / project / service process involve, or have consequences for employees or other people? If yes, please state who will be affected. If yes, then the policy / project is equality relevant.	If yes, state which protected groups: All groups
Yes. Council tax payers in the District and the County, adults on a low income with low savings, precepting authorities that levy a charge on the council tax.	If no, state reasons for your decision:
If no, state your reasons for this decision. Go to step 7.	
The majority of Council policies and projects are equality relevant because they affect employees or our communities in some way.	

Step 3. Gather evidence to inform the equality analysis

What evidence have you gathered to help you understand the impact of your policy or service change or withdrawal on people? What does your evidence say about the people with the protected characteristics? If there is no evidence available for any of the characteristics, please explain why this is the case, and your plans to obtain relevant evidence. Please refer to Factsheet 2 'Sources of evidence for the protected characteristics'

Characteristic	Evidence (name of research, report, guidance, data source etc)	What does this evidence tell you about people with the protected characteristics?	
Age Disability Sex Marriage and civil partnership Pregnancy and maternity Race / ethnicity	Data from current claims for Local Council Tax Support relating to age, disability, sex, marital status and whether pregnant. If provided by the claimant, data is held on race/ethnicity	50% of the Local Council Tax Support caseload are of pension age.	
Religion or belief Gender reassignment Sexual orientation	Limited data relating to current claims for Local Council Tax Support as this data is not required for the assessment of entitlement to Local Council Tax Support		

Steps 4 & 5 Analyse the activity, policy or change (*The duty to eliminate unlawful discrimination*)

Based on the evidence you have analysed, describe any actual or likely adverse impacts that may arise as a result of the policy decision. Where actual or likely adverse impacts have been identified, you should also state what actions will be taken to mitigate that negative impact, ie what can the Council do to minimise the negative consequences of its decision or action.

Characteristic	Actual or likely adverse impacts identified	Actions that are already or will be taken to reduce the negative effects identified
Age Disability Gender reassignment Marriage and civil partnership Race / ethnicity Religion or belief	People with disabilities or people of pension age or people with children, may experience hardship because of their reduced capacity to increase their income from other means. This scheme provides some protection against welfare reform cuts for these groups	The Exceptional Hardship Payment (EHP) fund can be used in exceptional circumstances to assist people who are struggling financially and to mitigate some of the adverse effects of the scheme.
Sex Sexual orientation	The scheme for people of working age applies to all claimants regardless of their characteristics, although persons with a disability	

	and/or dependant children are treated more favourably within the scheme.	
Pregnancy and maternity	The specific change to the family premium will affect new claimants in this group from April 2017, as the calculation of entitlement will not include a family premium. The specific change to the dependants allowance will affect claimants in this group from April 2017, as the dependants allowance used in the calculation will not be increased for additional children if the claimant already has at least 2 children,	Existing claimants are protected from the change in the family premium whilst they continue to claim Local Council Tax Support. Existing claimants are protected from the change to the dependants allowance, unless they already have 2 children and additional children are born after 1 April 2017. There is also protection built into the scheme for multiple births, rape and merging households.

Step 6.

The duty to advance equality of opportunity

Can the policy, service or project help to advance equality of opportunity in any way? If yes, provide details. If no, provide reasons.(Note: not relevant to marriage and civil partnership)

Characteristic	Ways that this policy, service or project can advance equality of opportunity	Why this policy, service or project cannot help to advance equality of opportunity:
Age Disability	The scheme is more generous to people of pensionable age and people with disabilities. This is a positive thing in terms of equality of opportunity as these groups are less likely to be able to change their financial position, for example' by finding work.	There may be a reduction in support given to people of working age because people of pensionable age are protected from adverse changes to the scheme. The effect of changing the scheme will therefore fall disproportionately on those of working age
Gender reassignment Religion or belief Sex Sexual orientation	These groups are dealt with in the same way as other working age claimants. It is not considered that their ability to access other sources of income is less because of these characteristics.	
Race / ethnicity	A translation service can be provided for people whose English is limited	
Pregnancy and maternity	The scheme is more generous to people with children. The EHP scheme can assist people affected by the 2017/18 scheme changes who find themselves in exceptional financial hardship. People who have multiple births or are the victims of rape are protected from the 2017/18 changes	The specific changes to the dependants allowance will adversely affect this group who have a third or subsequent child from April 2017.

The duty to foster good relations

Can the policy, service or project help to foster good relations in any way? If yes, provide details. If no, provide reasons. (*Note: not relevant to marriage and civil partnership*)

Characteristic	How this policy, service or project can foster good relations:	Why this policy, service or project cannot help to foster good relations:
Age	The policy can assist people of pensionable age to remain in their home contributing to more stable communities, but in any event the EHP scheme can help people who find themselves in exceptional circumstances.	There is a possibility of animosity being engendered in people of working age due to people of pensionable age being treated more favourably
	The clarity provided by having a Local Council Tax Support scheme in place, can help people to understand why different groups of people are being treated differently. This is relevant for all groups.	
Disability	People with a disability are treated more favourably within the scheme. This allows greater disposable income and therefore allowing greater independence within the community, but, in any event the EHP scheme can help people who find themselves in exceptional circumstances.	
Gender reassignment Pregnancy and maternity Race / ethnicity Religion or belief Sex Sexual orientation	No identified impact, but the EHP scheme can help people who find themselves in exceptional circumstances.	

Step 7. Documentation and Authorisation

Summary of actions to be taken as a result of this analysis (add additional rows as required):	Name and job title of responsible officer	How and when progress against this action will be reported
Non identified		
2.		
3.		

Name and job title of officer completing this analysis:	Janet Twinn
Date of completion:	12/6/17
Name & job title of responsible officer:	Bob Palmer
(If you have any doubts about the completeness or sufficiency of this equality analysis, advice and support are available from the Performance Improvement Unit)	Director of Resources
Date of authorisation:	
Date signed copy and electronic copy forwarded to PIU equality@eppingforestdc.gov.uk	

Step 8. Report your equality analysis to decision makers:

Your findings from this analysis (and any previous analysis) must be made available to a decision making body when it is considering the relevant service or policy. Therefore you must:

- reflect the findings from this analysis in a 'Due Regard Record' (template available), and attach it as an appendix to your report. The Record can be updated as your policy or service changes develop, and it exists as a log of evidence of due regard;
- Include this equality information in your verbal report to agenda planning groups or directly to portfolio holders and other decision making groups.

Your summary of equality analysis must include the following information:

- if this policy, service change or withdrawal is relevant to equality, and if not, why not;
- the evidence base (information / data / research / feedback / consultation) you used to help you understand the impact of what you are doing or are proposing to do on people with protected characteristics;
- what the evidence base (information / data / research / feedback / consultation) told you about people with protected characteristics;
- what you found when you used that evidence base to assess the impact on people with the protected characteristics;
- whether or not your policy or service changes could help to advance quality of opportunity for people with any of the protected characteristics;
- whether or not your policy or service changes could help to foster good relations between communities.



Report to the Cabinet

Report reference: C-008-2017/18
Date of meeting: 11 July 2017



Portfolio: Planning & Governance

Subject: Epping Forest District Draft Local Plan Regulation 18

Consultation

Responsible Officer: Alison Blom-Cooper (01992 564066).

Democratic Services: Gary Woodhall (01992 564470).

Recommendations/Decisions Required:

(1) That the findings of the Draft Local Plan Consultation be noted;

(2) That the update in relation to progress in the production of the Local Plan be noted.

Executive Summary:

This report provides the findings of the Regulation 18 Draft Local Plan Consultation that took place between the 31 October 2016 and 12 December 2016. This follows the earlier report to Cabinet on 9 March 2017 that provided the interim findings of the consultation analysis, together with the updated Local Development Scheme. The Council received a large number of representations from a wide range of stakeholders to the Regulation 18 Draft Local Plan Consultation, and detailed analysis of the comments received has now been completed. The Council received 3,387 responses from 3,072 respondents. A summary of the key issues raised, together with the Council's response to these issues, is provided as Appendix A. An Executive Summary of the Consultation Report is provided as Appendix B. The Consultation Report provides both quantitative and qualitative analysis of the feedback received to the consultation.

The report also provides an update in relation to progress being made in the production and finalisation of the Local Plan. The Regulation 19 Pre-Submission Local Plan is due to be published in early 2018, at which stage the Council will invite comments in relation to the 'soundness' and 'legal compliance' of the Plan. The Local Plan will then be submitted to the Secretary of State for Examination-in-Public.

Reasons for Proposed Decision:

To provide Members with feedback from the Regulation 18 Draft Local Plan consultation and provide an update in plan preparation.

Other Options for Action:

Not to advise members of the key issues from the recent Draft Local Plan consultation.

Report:

- 1. In accordance with the agreed Local Development Scheme, the Cabinet considered the Draft Local Plan on 6 October 2016 and subsequently Full Council agreed the Draft Local Plan for consultation on 18 October 2016. The formal 6-week consultation started on 31 October 2016 and ended on 12 December 2016. Full Council also agreed on 18 October 2016 that the Draft Local Plan policies should be treated as a material planning consideration when determining planning applications. The Planning Policy Team has produced a guidance note to officers in Development Management to ensure consistency of approach this note is available on the Council's website.
- 2. Consultation on the Draft Local Plan was carried out in compliance with the Council's agreed Statement of Community Involvement and as agreed by Cabinet on 1 September 2016. Full details of the consultation strategy utilised by the Council and the engagement methods were reported to the earlier meeting of the Cabinet on 9 March 2017, together with the interim findings from the Questionnaire responses to the consultation that had been analysed at that time.
- 3. Since the Cabinet meeting in March, the detailed processing and analysis of all remaining consultation responses, including those received via letter and email, has been completed.

Summary of the Consultation

- 4. The Council received 3,387 responses from 3,072 respondents. 7% of responses were received through 'hardcopy' questionnaires, 22% via letter, 23% via email and 48% via online questionnaires. Quantitative analysis has been undertaken on the results of the tick-box questions in the questionnaire. Qualitative analysis has been undertaken on the open text in the questionnaire, letters, emails and supporting documents received as attachments.
- 5. To manage the volume of responses and ensure that all responses were considered consistently, a classification process was utilised. This consisted of establishing a detailed 'classification tree', which comprised a list of wide ranging categories covering key topics raised by respondents. The open text of the responses was then classified against these categories. Where responses covered a number of separate points these were separately classified against their respective categories, splitting each response in to a series of 'comments'. This classification process has ensured that the breadth and frequency of comments received has been captured and understood against recurring issues, enabling a more detailed analysis against the individual points raised.
- 6. Within the classification of feedback, respondents were assigned to a 'contact' group so it was possible to track the number of resident, agent/landowner or developer, business and statutory consultee responses, as well as being able to track the number of petitions and 'group form' multiple signatory responses.
- 7. Through the analysis undertaken by Remarkable, it has been possible to identify the 10 most frequently stated comments to the Draft Local Plan consultation. These can be summarised as follows:
 - an increase in traffic congestion on local roads;
 - a negative impact on local schools;
 - increased pressure on the local healthcare provision;
 - a loss of car parking spaces and increased car parking pressure;

- a negative impact on the character of settlements;
- increased overcrowding on the Central Line;
- a loss of managed open space in the urban areas of the District;
- comments regarding Draft Policy P 2 on the proposed site allocations in Loughton;
- insufficient information about the infrastructure requirements of the District;
 and
- general comments disagreeing with the principle of development in the Green Belt.

Consultation Report

- 8. An Executive Summary of the Consultation Report is provided as Appendix B. The full Consultation Report prepared primarily by the consultants Remarkable provides detailed quantitative and qualitative analysis of the feedback received to the consultation, and is available as a background document to this report. Council officers were responsible for the sections summarising the comments received from stakeholders and other local organisations and those received from site promoters. The report includes details of:
 - The Draft Local Plan Consultation Strategy (chapter 4);
 - Who has responded to the consultation (chapter 5); and
 - Analysis of responses received in relation to each section of the Draft Local Plan (chapters 6-15);
- 9. The appendices to the report also provide detailed breakdowns of the number of classified comments per topic / Draft Local Plan Policy.
- 10. 527 classified comments were received in support of the spatial strategy and site selection process. 240 of these stated a preference for allocating growth around Harlow, as identified in Draft Policy SP 3, and suggested that this was appropriate due to the new town status of Harlow and its associated infrastructure, as well as how it could benefit from additional investment. However, 2,180 classified comments disagreed with the site selection process (received from 966 respondents). This included 507 comments relating to sites that were perceived to be 'better' choices than those currently selected. 361 comments were received in relation to sites that are not identified for allocation. Whilst the majority of these came from site promoters for sites that have not been selected, this also included respondents who have questioned why a particular site they are aware of has not been selected, and feel is a better option for growth.

Statutory Consultees and Other Local Organisations

11. A summary of the key issues arising from the responses received from 'statutory consultees, Parish/Town Councils and other organisations' was included in the report to Cabinet on 9 March 2017 and further detail is set out in the Consultation Report. The Council is continuing to progress with responding to issues raised by way of further work as appropriate. The Council will continue to liaise closely with relevant statutory consultees in finalising the Local Plan and the evidence which supports it.

Site Selection Process

12. Since the previous cut-off date for the site selection process used to inform the Draft Local Plan 93 additional 'new' residential sites have been put forward for consideration by the Council in the finalisation of the Local Plan. Additionally, some landowners/site promoters have requested changes to the boundary of residential sites and 49 amended residential

sites will be assessed. Three sites have been withdrawn from consideration. The Council is now beginning the process of further detailed assessment of potential sites for consideration, taking into account comments received through the Draft Local Plan consultation, which will result in a further Site Selection process. The Site Selection process will also consider approximately 13 potential Employment and 14 potential Traveller sites, meaning that in total the Council will be assessing approximately 169 sites. The methodology for the site selection process will be published shortly on the Council's website. It is not possible to say at this stage whether or not any sites proposed for allocation in the Draft Local Plan will change through this process, but the Council is committed to assessing and evaluating all site options consistently and robustly in accordance with an agreed methodology and national planning policy guidance. This process will not consider sites which have been submitted to the Council after the cut-off date of 31 March 2017.

Further Work to Inform the Pre-Submission Local Plan

- 13. Work continues to progress key strands of the evidence base that will inform and support the Local Plan as follows:
 - (a) Work is continuing in partnership with Essex County Council to develop the Transport Assessment. Modelling is being undertaken in order to confirm the implications of planned growth on the transport network, and identify the necessary mitigation measures required to support future growth. This will include road and junction upgrades, in addition to sustainable transportation improvements to support a modal shift away from car use as far as possible.
 - (b) The Open Space, Playing Pitch and Indoor Sports Facilities Studies are progressing as scheduled. The studies will provide details of future standards, and identify where new provision is required, taking into account the growth plans set out within the Draft Local Plan.
 - (c) A programme of stakeholder engagement is underway in relation to the Infrastructure Delivery Plan (IDP). The IDP will detail the key infrastructure requirements associated with growth and development set out within the Local Plan, together with funding and delivery arrangements.
 - (d) Work is progressing to identify the future employment requirements for the Functional Economic Market Area and for the District, which will help to inform future employment allocations to the included within the Local Plan.
- 14. Officers are working to respond to the representations and feedback received to the Draft Local Plan consultation, and progress the Plan accordingly. The Regulation 19 Pre-Submission Local Plan is due to be published in early 2018, at which stage the Council will invite comments in relation to the 'soundness' and 'legal compliance' of the Plan. The Local Plan will then be submitted to the Secretary of State for Examination-in-Public.
- 15. As part of the finalisation of the Plan, the Council is required to produce a Consultation Statement. This will need to set out how the Council has involved the local community, stakeholders and statutory bodies in the formulation of the Local Plan. Importantly, it will need to provide a summary of the main issues raised by the representations made, and also how any representations made have been taken into account in the plan preparation process.
- 16. Accordingly, Appendix A sets out a summary of the main issues raised through the Draft Local Plan consultation, and how these are being taken into account in the further plan preparation process. It is intended that Appendix A will ultimately form part of the Local Plan

Consultation Statement.

- 17. 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.
- 18. 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. Whilst progressing the Local Plan, Officers are also working to progress matters associated with the delivery of the Harlow and Gilston Garden Town, as well as working to establish appropriate mechanisms internally within the Council to ensure that the Local Plan can be effectively implemented (as reported to Cabinet on 15 June 2017).

Resource Implications:

The budget for analysis of Draft Local Plan Regulation 18 consultation was approved as part of the Local Plan budget in December 2016.

Legal and Governance Implications:

The Council is required to prepare and maintain an up to date Local Plan to set out the strategic priorities for the area and the policies that address these.

Safer, Cleaner and Greener Implications:

The delivery of a Local Plan, informed by a robust evidence base, will contribute to safer, cleaner, greener objectives by planning for sustainable development.

Consultation Undertaken:

Full public consultation on the Draft Local Plan in accordance with Regulation 18 of the Local Plan Regulations 2012 and in accordance with the Council's Statement of Community Involvement involving residents, local businesses, neighbouring local authorities and statutory consultees as detailed in the report.

Background Papers:

- Epping Forest District Council Draft Local Plan Consultation Report (2017)
- National Planning Policy Framework (2012)
- Epping Forest District Draft Local Plan (2016)
- Local Plan Regulations (2012)
- Epping Forest Statement of Community Involvement (2013)
- Epping Forest Planning Policy Briefing Note version 2 (April 2017)

Risk Management:

The continued progression and implementation of the Local Plan is required in order to manage and mitigate the risks of potential speculative or uncoordinated development across the District. The adoption of the Local Plan will help to ensure that the Council is making adequate provision for the development and infrastructure needs of the District, including a sufficient supply of deliverable housing land as required by national planning policy.

The adoption of the Local Plan will ensure that the Council has a full suite of up to date planning policies to promote and manage high quality sustainable development in the District.

The Council needs to make timely progress on the preparation of a Local Plan to avoid the risk of intervention by the Secretary of State.



Equality analysis report

Use this report template to record your equality analysis. This report is a written record that demonstrates that you have shown *due regard* to the need to **eliminate unlawful discrimination**, **advance equality of opportunity** and **foster good relations** with respect to the personal characteristics protected by equality law. Due regard must be paid at formative stages of policy or service development, changes, or withdrawal.

To assist you in completing this report, please ensure you read the guidance notes in the Equality Analysis Toolkit and refer to the following Factsheets:

- Factsheet 1: Equality Profile of the Epping Forest District
- Factsheet 2: Sources of information about equality protected characteristics
- o Factsheet 3: Glossary of equality related terms
- o Factsheet 4: Common misunderstandings about the Equality Duty
- o Factsheet 5: Frequently asked questions
- Factsheet 6: Reporting equality analysis to a committee or other decision making body

If you require further help, please contact the Performance Improvement Unit.

Step 1. About the policy, service change or withdrawal

Name of the policy, service or project: be specific	Draft Local Plan
Revised / new / withdrawal:	N/A
Intended aims / outcomes/ changes:	To ensure that the views of all stakeholders that responded to the Regulation 18 consultation are represented fairly and in full.
Relationship with other policies / projects:	N/A
Name of senior manager for the policy / project:	Alison Blom-Cooper
Name of policy / project manager:	Alison Blom Cooper

Step 2. Decide if the policy, service change or withdrawal is equality relevant

Does the policy / project / service process involve, or have consequences for employees or other people? If yes, please state who will be affected. If yes, then the policy / project is	If yes, state which protected groups:
equality relevant.	All stakeholders that participated in the consultation.
If no, state your reasons for this decision. Go to step 7.	If no, state reasons for your decision:
The majority of Council policies and projects are equality relevant because they affect employees or our communities in some way.	

Step 3. Gather evidence to inform the equality analysis

What evidence have you gathered to help you understand the impact of your policy or service change or withdrawal on people? What does your evidence say about the people with the protected characteristics? If there is no evidence available for any of the characteristics, please explain why this is the case, and your plans to obtain relevant evidence. Please refer to Factsheet 2 'Sources of evidence for the protected characteristics'

Characteristic	Evidence (name of research, report, guidance, data source etc)	What does this evidence tell you about people with the protected characteristics?
Age	http://www.eppingforestdc.gov.uk/index.php/help/file-store/category/105-evidence-base Population projection evidence SHMA evidence base Census Employment evidence	The evidence outlines the needs for housing provision for all age groups including the ageing population
Dependents / caring responsibilities	http://www.eppingforestdc.gov.uk/index.php/help/file-store/category/105-evidence-base Population projection evidence SHMA evidence base Census data Employment evidence	The evidence outlines the needs for housing provision for all age groups including the ageing population and assisted living requirements and care homes. It will also identify the need for jobs at all levels. Housing standards to be applied will be in line with the lifetime homes standards which cater for ageing population, mobility needs and other disabilities.
Disability	http://www.eppingforestdc.gov.uk/index.php/help/file-store/category/105-evidence-base Population projection evidence SHMA evidence base Census data	Housing standards to be applied will be in line with the lifetime homes standards which cater for ageing population, mobility needs and other disabilities. Where there is evidence pointing to other housing and employment needs these will be provided through the Plan.
Gender reassignment	There is no evidence directly related to this. The Plan will not be applying policies that are bias to any groups in terms of the provision of housing and job projection needs.	

Marriage and civil partnership	http://www.eppingforestdc.gov.uk/index.php/help/file-store/category/105-evidence-base Population projection evidence SHMA evidence base Census data	Population projection information based on census provides this information pointing toward changing household trends and future provision needs for existing families and new family unit trends.
Pregnancy and maternity	http://www.eppingforestdc.gov.uk/index.php/help/file-store/category/105-evidence-base Population projection evidence SHMA evidence base	Population projection information based on census will provide this information pointing toward changing household trends and future provision needs. Needs for clinics and specialist facilities are also in the scope of the plan and being addressed.
Race / ethnicity	Information collated through previous monitoring, population projection trends and consultation feedback will have provided some information	The need for community centres etc and provision will be made accordingly. The Plan will not be applying policies that are bias to any groups.
Religion or belief	Information collated through previous monitoring, population projection trends and consultation feedback will have provided some information	The need for community centres, churches etc and provision will be made accordingly. The Plan will not be applying policies that are bias to any groups.
Sex	Information collated through previous monitoring may have provided some information, although policies and development proposals in the plan will not be sex related/dependant.	
Sexual orientation	Information collated through previous monitoring, may have provided some information. The Local Plan will not be applying policies that are bias to any groups. If we have received and will receive information to support the need for development associated with specific groups we will address as part of the Plan, although policies and development proposals in the plan will not be sex orientation related/dependant.	

Steps 4 & 5 Analyse the activity, policy or change (*The duty to eliminate unlawful discrimination*)

Based on the evidence you have analysed, describe any actual or likely adverse impacts that may arise as a result of the policy decision. Where actual or likely adverse impacts have been identified, you should also state what actions will be

taken to mitigate that negative impact, ie what can the Council do to minimise the negative consequences of its decision or action.

No actual or likely adverse impacts have come to light, just needs based assessments guiding the Planning Policy team to ensure that demands of the people working, living and visiting the district are met over the Plan period to 2033. The Local Plan must plan positively for future needs around housing and employment and is required to meet the needs that have been identified in the evidence base, including the consultations. If the Draft Plan consultation with stakeholders brings up additional needs for the below groups, which the Plan must make provision for, then the team will ensure that this is taken into account. At the moment there has been a thorough and widespread engagement process to date with all stakeholders, via email (11,000 email addresses), on our website, letters and consultation information distributed to all households in the District, town and parish councils and resident associations and leaflets to commuters.

Characteristic	Actual or likely adverse impacts identified	Actions that are already or will be taken to reduce the negative effects identified
Age	As above	
Dependents / caring responsibilities	As above	
Disability	As above	
Gender reassignment	As above	
Marriage and civil partnership	As above	
Pregnancy and maternity	As above	
Race / ethnicity	As above	
Religion or belief	As above	
Sex	As above	
Sexual orientation	As above	

Step 6.

The duty to advance equality of opportunity

Can the policy, service or project help to advance equality of opportunity in any way? If yes, provide details. If no, provide reasons. (Note: not relevant to marriage and civil partnership)

The Local Plan cannot advance equality of opportunity in the below categories directly via specific policies or land allocations. That is not its purpose and is intended to be a growth and policy Plan, based on objectively assessed evidence that has no motive other than to provide housing, employment, social and recreational infrastructure to meet the needs of our stakeholders. As above in step 3 however information has been collated throughout the project

including the consultations and evidence studies that have provided information necessary to make the appropriate provisions for people of all ages, cater for any disability needs (e.g assisted living accommodation) and make provision for future needs, i.e. places of worship, civic and community centres, health clinics/medical centres. The allocation of land for housing, employment and social infrastructure, community uses and related policies are there to cater for all, in line with the emerging evidence without discrimination against any group.

Characteristic	Ways that this policy, service or project can advance equality of opportunity	Why this policy, service or project cannot help to advance equality of opportunity:
Age	As above	
Dependents / caring responsibilities	As above	
Disability	As above	
Gender reassignment	As above	
Pregnancy and maternity	As above	
Race / ethnicity	As above	
Religion or belief	As above	
Sex	As above	
Sexual orientation	As above	

The duty to foster good relations

Can the policy, service or project help to foster good relations in any way? If yes, provide details. If no, provide reasons. (Note: not relevant to marriage and civil partnership)

Characteristic	How this policy, service or project can foster good relations:	Why this policy, service or project cannot help to foster good relations:
Age	By making adequate provision for housing and employment for all age groups and needs. This is a statutory duty but by fulfilling it the Council strengthens its relationship with stakeholders.	
Dependents / caring responsibilities	By making adequate provision for housing and employment for all age groups and needs e.g. assisted living housing.	
Disability	Applying relevant housing standards and ensuring adequate support services whether medical centres and other facilities identified via the consultation feedback and evidence	
Gender reassignment	N/A	No active polices in Plan

Pregnancy and maternity	By making adequate provision for housing and employment for all age groups and needs	
Race / ethnicity	Making appropriate provisions for housing and employment and civic/community centres as per the evidence	
Religion or belief	Making appropriate provision for civic/community centres/places of worship.	
Sex	N/A	No active policies
Sexual orientation	N/A	No active policies

Step 7. Documentation and Authorisation

Summary of actions to be taken as a result of this analysis (add additional rows as required):		Name and job title of responsible officer	How and when progress against this action will be reported
1.	Presentation of high level findings of consultation feedback to cabinet.	Alison Blom Cooper	9 March 2017
2.	Detailed analysis of consultation responses and production of a consultation report.	Alison Blom Cooper	11 July 2017
3.	Production of final Local Plan.	Alison Blom Cooper	Ongoing with regular reports – consultation statement produced with Reg 19 plan

Name and job title of officer completing this analysis:	Alison Blom-Cooper Interim Asst Director Planning Policy & Economic Development
Date of completion:	12/06/2017
Name & job title of responsible officer: (If you have any doubts about the completeness or sufficiency of this equality analysis, advice and support are available from the Performance Improvement Unit)	Derek Macnab Director Neighbourhoods
Date of authorisation:	
Date signed copy and electronic copy forwarded to PIU equality@eppingforestdc.gov.uk	

Step 8. Report your equality analysis to decision makers:

Your findings from this analysis (and any previous analysis) must be made available to a decision making body when it is considering the relevant service or policy. Therefore you must:

- o reflect the findings from this analysis in a 'Due Regard Record' (template available), and attach it as an appendix to your report. The Record can be updated as your policy or service changes develop, and it exists as a log of evidence of due regard:
- Include this equality information in your verbal report to agenda planning groups or directly to portfolio holders and other decision making groups.

Your summary of equality analysis must include the following information:

- if this policy, service change or withdrawal is relevant to equality, and if not, why not;
- the evidence base (information / data / research / feedback / consultation) you used to help you understand the impact of what you are doing or are proposing to do on people with protected characteristics;
- what the evidence base (information / data / research / feedback / consultation) told you about people with protected characteristics;
- what you found when you used that evidence base to assess the impact on people with the protected characteristics;
- whether or not your policy or service changes could help to advance quality of opportunity for people with any of the protected characteristics;
- whether or not your policy or service changes could help to foster good relations between communities.



Appendix A - Key Issues identified through the Regulation 18 Consultation of the Draft Local Plan 2016

Key Issue	EFDC Response
Meeting the requirements for providing land for custom and self-build housing.	Draft Policy H 1 in the Draft Local Plan includes the Council's proposed policy for future housing mix and accommodation types, including self-build and custom-build housing. As required under Section 1 of the Self-build and Custom Housebuilding Act (2015), the Council currently maintains a register of individuals and associations of individuals seeking to acquire land for self- or custom- build housing. Should the SHMA be updated at a later date, this register will be used as evidence to identify the level of demand for custom and self-building housing.
Demonstrating a five year housing land supply and addressing an historic shortfall in housing delivery.	The Draft Local Plan includes a range of proposed housing allocations, including smaller sites which may be delivered relatively quickly, and other larger strategic sites of greater complexity which will may have longer lead-in times to delivery. Appendix 5 to the Draft Local Plan includes an indicative housing trajectory for residential allocations across the Plan Period. The Council will be undertaking further work to identify and demonstrate a five year supply of housing and to agree an approach to meeting any shortfall in housing supply in a way that is feasible. This will be informed by the further site selection work which is being carried out this year.

	Key Issue	EFDC Response
Page 128	Identifying the District's full Objectively Assessed Housing Need.	The 2012 SHMA used as its starting point the DCLG household projections of 2012 to define the objectively assessed need for the West Essex/East Herts SHMA. This set out a combined level of housing need across the SHMA area of 46,058 homes for the period 2011-2033. Following the publication in July 2016 of the 2014 household projections updating the 2012 data the SHMA authorities undertook an update – see note on updating the overall housing need based on 2014 based projections (ORS August 2016). This note was used as the basis for preparing the Memorandum of Understanding (MoU) on the distribution of objectively assessed housing need across the West Essex/East Herts SHMA. The East Herts District Plan has been submitted for examination and in response to the Inspector's note of 16 May 2017 on the submitted plan the four authorities have commissioned a further update from ORS to review the overall housing need across the SHMA taking account of the latest ONS population estimates due to be published in June 2017. This will include clear recommendations on the OAN for the SHMA and individual authorities. It will include an update of the balance between the need for market housing and the need for affordable housing within the overall housing need. A final report is scheduled for 14 July 2017. The Draft Local Plan based the level of housing growth on the work undertaken for the four authorities and provides for in excess of 11,400 homes (the OAN) over the plan period. Further technical assessments following publication of more recent data may lead to changes to the proposed housing requirement and this will be kept under review between now and the examination of the Plan.
	The appropriateness of the housing requirement set out in the Draft Local Plan.	As stated in paragraph 3.62 of the Draft Local Plan, the Council has made provision for sites above and beyond those required to meet the housing target of 11,400 dwellings. This is intended to provide flexibility in terms of managing economic cycles, factors relating to specific sites which may result in them being stalled or needing to be removed from the Plan, and to provide flexibility in case housing requirements increase prior to Examination. This demonstrates the Council's commitment to positive planning to meet the full Objectively Assessed Housing Need.

	Key Issue	EFDC Response
	The Council's preferred Spatial Strategy and the proposed distribution of growth across the District, including the number of new homes identified for each settlement, and whether this is proportionate.	The Council's preferred spatial strategy as set out in the Draft Local Plan is to focus growth around Harlow, which represents the most sustainable location, with the remaining housing need distributed housing across the settlements of the District. This approach was based on the outcome of the 2012 Issues and Options consultation along with planning judgement, taking account of: - impact on the Green Belt and landscape - accessibility to services, - the level of growth need to ensure infrastructure can be supported and any specific needs identified, - the mixture of suitable, available and achievable sites within each settlement, - maximising the development potential within existing settlements focussing on brownfield land with higher densities where possible, - maximising opportunities for growth of North Weald Bassett in line with the Masterplanning Study, and - that development proposals should support the realisation of the emerging settlement visions.
Page		Further testing of the proposed distribution of growth across the settlements in the District will be undertaken through options appraisal in the ongoing Sustainability Appraisal.
129	Ensuring adequate provision for older persons in the District.	In preparing the Draft Local Plan, the Council has used up-to-date evidence on housing needs, including careful consideration of future population projections. This evidence (set out in the SHMA 2015) identifies the need for specialist housing to support an ageing population, included assisted living and care homes over the plan period, and this is included within the general housing requirement. Draft Policy H 1 demonstrates that the Local Plan will require that future development includes an appropriate mix of housing to meet the needs of the ageing population in the District, and that development is located in the most sustainable locations and supported by the necessary infrastructure. Part C of Draft Policy H 1 makes provision for specifically designed housing to meet these specialist needs, including older persons accommodation, where there is a proven identified need, the location is appropriate and the proposals are well designed. Comments made on meeting older persons housing needs, including the potential for a new specific policy on older persons housing, will be considered by the Council as it finalises the Pre-Submission (Regulation 19) version of the Plan.

[Key Issue	EFDC Response
	The level of affordable housing provision required by Draft Policy H 2 and whether the approach provides sufficient flexibility, and is supported by evidence.	The Draft Local Plan sets out the approach to affordable housing in Draft Policy H 2. The approach to seeking a minimum of 40% affordable homes on sites of 11 or more dwellings is supported by evidence in the SHMA (2015) and the Stage 1 Assessment of the Viability of Affordable Housing, Community Infrastructure Levy and Local Plan (2015). This evidence suggests that the level of affordable housing is viable and deliverable. Further viability work will be undertaken to consider in more detail the viability of the Local Plan and its draft housing allocations, and the viability implications of the Starter Home requirements, and will take into account the responses received to the Draft Local Plan consultation.
Page	The District's approach to managing impacts on Epping Forest Special Area of Conservation (SAC).	An HRA screening of the Draft Local Plan supported the approach outlined in the agreed Memorandum of Understanding (MoU) on managing the impacts of growth within the West Essex/East hertfordshire Housing Market Area on Epping Forest Special Area of Conservation as a basis to achieve material improvements in air quality and nitrogen inputs to the Forest SAC by 2033. The MoU commits the authorities to prepare an action plan which will be taken forward to Regulation 19 publication. The Council is currently updating the transport modelling in this District to inform this work and will be looking to identify the requirements for accessible natural greenspace and financial contributions, working together with other relevant authorities.
130	Satisfying the Duty to Cooperate.	The four districts in the HMA for West Essex/East Herts (Epping Forest DC, East Herts DC, Harlow DC and Uttlesford DC) have a substantial history of coordinated working on strategic cross boundary planning issues including housing need, employment, transport etc. The Councils together with other adjoining authorities and the two Counties (Herts CC and Essex CC) established the Cooperation for Sustainable Development Member Board in October 2014. This has been meeting monthly and is serviced by an officer group. The authorities through the Board have commissioned a number of pieces of evidence to support the identification of the objectively assessed employment and housing need; to review strategic options for accommodating residential growth across the area; and to assess the potential for delivery of strategic sites around Harlow. Further work is programmed. There are now three signed MOUs on distribution of housing need, highway impact and air quality impacts on Epping Forest, and further evidence base work is underway to underpin a fourth MOU on the distribution of economic growth across the Functional Economic Market Area. The Council is satisfied that it is fulfilling the requirements of the Duty to Cooperate in the preparation of its Local Plan and continues to engage constructively, actively and on an on-going basis with relevant bodies on strategic planning matters.

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Appendix A - Key Issues identified through the Regulation 18 Consultation of the Draft Local Plan 2016

	Key Issue	EFDC Response
	Planning for the relocation / redevelopment of the Princess Alexandra Hospital.	The Princess Alexandra Hospital, which is located on a highly constrained site near Harlow town centre, faces a number of challenges in continuing to serve the needs of its catchment. One potential option is to relocate to a new site, and two potential new sites have been identified, one of which is in Epping Forest District and the other in East Herts District. The hospital is currently preparing a Strategic Outline Case in order to apply for the necessary funding from Government and the outcome of this work will be required before a decision is made on the future of hospital provision in the area.
	Meeting the requirements for Sustainability Appraisal and Habitats Regulation Assessment.	An Interim Sustainability Appraisal and Habitats Regulation Assessment screening were published alongside the Draft Local Plan. Further work will be undertaken on SA and HRA as part of the Proposed Submission (Regulation 19) version of the Plan, and will consider comments made through representations.
Dago	The assessment of Strategic Options and sites around Harlow.	The AECOM study (August 2016) for the West Essex and East Herts authories considered the strategic options for residential growth around Harlow, and the result of this work informed the proposed strategic site allocations. Further work is being undertaken by AECOM and a technical addendum is being prepared to support this work which will provide additional information. This will be published alongside the Pre-Submission (Regulation 19) version of the Plan and will consider the comments made through representations.
121	Consistency between the draft vision and objectives, draft policies and proposed site allocations in the Draft Local Plan.	Plan-making is an iterative process. The draft vision and objectives, draft policies and proposed site allocations have informed, and in turn have been informed, as the work to produce the draft Local Plan has progressed. Following Regulation 18 consultation, the vision and objectives, polices and site allocations will be revisited as part of preparation of the Proposed Submission (Regulation 19) version of the Plan.

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	Key Issue	EFDC Response
Dage	Infrastructure requirements and delivery, including provision for CIL charging schedule.	A Draft Infrastructure Delivery Plan (IDP) was published alongside the Draft Local Plan for Regulation 18 consultation, which set out a baseline of existing infrastructure provision and areas of identified shortfall. The IDP is being developed iteratively, and the Council will be undertaking further modelling work on the proposed site allocations and policies in the Draft Local Plan. The updated IDP which will be prepared in support of the Pre-Submission (Regulation 19) version of the Plan will identify the infrastructure required to support planned growth, including the organisation responsible for delivering each infrastructure item, the period over which the relevant investment will be required, and the cost of each item and how it will be funded. A decision on whether to adopt a Community Infrastructure Levy (CIL) schedule for funding infrastructure has not yet been made. The Council will be undertaking further viability work on the proposals and policies in the Draft Local Plan to assess whether or not a CIL charging schedule would be viable and appropriate. This further evidence will then be used to inform the preparation of the Pre-Submission (Regulation 19) version of the Plan, and will be used to decide whether or not to progress with introducing CIL for the District.
120	The identification of District Open Land in Draft Policy SP 5.	The rationale for identifying District Open Land is set out in Background Paper 4.
	Concerns about traffic congestion and other transport issues (including cross-boundary issues), and how these are being addressed in the Plan.	The Council has undertaken a number of transport studies to inform the Draft Local Plan. Information on these can be found in Background Paper 2 and associated Technical Notes. Further transport modelling work has been commissioned to understand the detailed impacts of the draft local plan site allocations and identify interventions that may be required to mitigate any adverse impacts. The evidence produced as part of this further transport modelling will feed into final selection of sites in the Pre-Submission Publication Plan. A joint Transport Memorandum of Understanding has been signed between the HMA district authorities, Essex County Council, East Hertfordshire County Council and Highways England. The MoU sets out the collaborative working approach between the authorities to addressing strategic and cross-boundary highway and transport issues around Harlow.
	The relationship between the Draft Local Plan and emerging and forthcoming Neighbourhood Plans.	We are aware that a number of Parish and Town Councils within the District are preparing neighbourhood plans for their areas. The Council will continue to provide advice and assistance to ensure that the Neighbourhood Plans are in general conformity with the strategic policies contained in the Local Plan and in line with national planning policy guidance.

Appendix A - Key Issues identified through the Regulation 18 Consultation of the Draft Local Plan 2016

[Key Issue	EFDC Response
	Development planned at North Weald Airfield.	The employment use(s) on North Weald Airfield over the Plan period, include the continued operation of the airfield, will be part of the further employment review work being undertaken by the Council.
	How the North Weald Bassett Masterplanning Study has informed the Draft Local Plan.	Allies and Morrisons Urban Practitioners (AMUP) were commissioned by the Council in 2014 to undertake a masterplanning study of North Weald Bassett which integrated the findings of earlier studies and public consultation to present a long term vision and aspirations for the village. The Study tested two spatial options to accommodate new homes, and concluded that Scenario B, which promotes development to the north of the settlement, was preferred. The outcome of the Study, using the higher growth option of 1,616 homes, was used to inform the selection and indicative capacity assessment of sites in North Weald Bassett, and to inform Draft Policy P 6 and the settlement vision in the Draft Local Plan.
Ū	Consistency with the Housing White Paper.	Please see report to Neighbourhoods Select Committee on 21st March 2017, which includes as an appendix the Council's response to the Housing White Paper.
2 PDB	Suggested changes to the wording of policies in the Draft Local Plan.	Detailed comments on the wording of Development Management policies are noted and will be considered further by the Council's technical specialists in preparing the Regulation 19 Pre-Submission Local Plan.
1 2 2	Concerns regarding the capacity of the Central Line.	The Council is undertaking further work with Transport for London, LB Redbridge and LB Waltham Forest to ensure that there is sufficient capacity on the Central Line over the plan period.
	The requirement to consider flood risk constraints through the Draft Local Plan.	The Council has undertaken an SFRA Stage 1, and used the Environment Agency's Flood Risk Zone mapping to assess sites proposed for allocation. The Council's strategy is to ensure that where possible all development is in Flood Zone 1 and only proposing land in Flood Zone 2 and 3 only where need cannot be met in Flood Zone 1.
	Mitigating and managing the impacts of poor air quality.	The Habitats Regulation Assessment (HRA) has informed the MoU on the impact of air quality on Epping Forest SAC, and the Council will be developing an action plan with neighbouring authorities to mitigate any impacts on the Forest. Air quality was one of the assessment criteria undertaken at Stage 2 of the Site Selection process.

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	Key Issue	EFDC Response
	The Lee Valley Regional Park and meeting the requirements under Section 14(1) of the Park Act.	The requirements under the Park Act have been met in sections 3.17 to 3.23 of the Draft Local Plan. Should the Lee Valley Regional Park Authority publish a updated Plan, this will be considered where necessary.
	Strategic Masterplanning for strategic sites and Planning Performance Agreements.	Please see report to Cabinet Committee 15 June 2017 which sets out the Council's approach to Strategic Masterplanning and PPAs.
מס	Concerns regarding the proposed Green Belt boundary alterations.	The Council has undertaken a Green Belt Review as part of the preparation of the Local Plan. This was one of the pieces of evidence taken into account in the site selection process. Further work to define detailed Green Belt boundary alterations will be undertaken prior to the Pre-Submission (Regulation 19) version of the Plan.
200 13 <u>4</u>	Requirement for further evidence on sports and recreation to support the policies in the Local Plan.	The Council is undertaking Open Space, Playing Pitch and Indoor Sports Studies in order to understand the current level of provision, and identify any additional requirements to provide sports and recreation facilities to meet the needs of the current and future population. This evidence will inform further site selection work, and any additional sports provision or policy will be set out in the Pre-Submission (Regulation 19) version of the Plan and the IDP.
	Concern that the polices and proposals in the Draft Local Plan will result in a loss of car parking spaces or insufficient provision of new parking spaces.	As stated in the Draft Local Plan, the redevelopment of car parks are expected to include new homes and retention of the current car parking provision. The Council is pursuing a wider transport strategy that focusses on encouraging sustainable transport choices and reduction in car use, however it is committed to finding the right balance between accommodating the car and making the best use of land. For further information on the Council's approach to car parking standards, please see the Transport Background Paper.
	Concern that the polices and proposals in the Draft Local Plan will result in a negative impact on the character of settlements.	The Site Selection Methodology had regard to settlement character under Stage 2 Criteria 5.2, which considered impact on heritage assets and their setting, Conservation Areas, landscape and built form amongst other factors, and these were also taken into account in the indicative capacity assessment. Additionally, Draft Policies DM 7, DM 8 and DM 9 make provision to protect heritage assets and ensure high quality design. Comments made will be considered further in preparing the Pre-Submission (Regulation 19) version of the Plan.

	Key Issue	EFDC Response
Page 135	Concern that the Draft Local Plan will result in a loss of public open spaces.	A small number of sites were put forward for assessment for development on land that is currently classified as managed open space within settlements. The site selection process concluded that a small number of sites which involve the loss of an element of open space should go forward as proposed allocations and for all, it is assumed that a minimum of 25% of the open space would be retained. This includes two proposed allocations on managed open space in Loughton and one in Chigwell. For more information see the background paper 3 on Open Space. Comments made will be considered as part of preparation of the Pre-Submission (Regulation 19) version of the Plan.
	Concern regarding the potential impact of proposed new traveller sites and expanded existing traveller sites.	The potential impact of traveller sites on was considered as part of the site selection process. This included looking at candidate sites' relationship to existing settlements, services and facilities, and neighbouring uses. Detailed assessment of the impact of development is considered through the planning application process at a later stage.
	The principle of releasing Green Belt land proposed	Government policy on the Green Belt, set out in the NPPF, is clear that Local Planning Authorities with Green Belts should establish Green Belt boundaries through their Local Plans. Once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. Over 92% of Epping Forest District is designated as Green Belt and the Green Belt boundaries have not been reviewed since the existing Local Plan was adopted in 1998.
	in the Draft Local Plan and demonstrating exceptional circumstances for doing so.	The evidence base for the Local Plan (most importantly the Report on Site Selection 2016) indicates that providing for the development needs to support long-term sustainability of the District requires a review of the Green Belt boundary. While the Council is pursuing a strategy which seeks to minimise the use of Green Belt land for development, it is clear that insufficient land outside the Green Belt exists to meet the development needs of the District, and alterations to the Green Belt boundaries are necessary. These local conditions demonstrate exceptional circumstances that require the proposed release of Green Belt land. For further information, please see Background Paper 4.
	The estimated capacity and density of development on proposed allocation sites.	The Site Selection Methodology (2016) sets out how the more detailed indicative capacity assessment was undertaken at Stage 3 of the site selection process. More work will be undertaken on the proposed allocation sites in preparing the Pre-Submission version of the Plan (Regulation 19) and a revised site capacity may be included in site guidance

[Key Issue	EFDC Response	
	Issues relating to Glasshouse evidence and policy in the Draft Local Plan.	Responses to the consultation generally supported the inclusion of Draft Policy E 3, whilst raising some concerns around managing the impact of HGV traffic on local roads particularly in Nazeing and Roydon. Comments will be considered and amendments will be made to Draft Policy E 3 where appropriate and supported by the evidence.	
	Comments relating to the forthcoming identification of employment sites for allocation in the Plan, and further employment land evidence.	Prior to the consultation on the Draft Local Plan, the Council completed Stages 1 and 2 of the Site Selection Methodology for employment sites. The remaining stages of the Site Selection Methodology will be completed prior to the Council publishing its Pre-Submission (Regulation 19) version of the Plan. To ensure that the consideration and assessment of known and potential employment sites within the District is up-to-date (in accordance with requirements in the National Planning Policy Framework), the Council has commissioned an Employment Review. This will review and, where relevant, update evidence currently held by the Council on the existing and potential future employment land supply in the District and the demand for employment land that is likely to arise over the Plan period. The outcomes from this work will inform further site selection work.	
U 2 2 2 2	Suggestion for the need to undertake a Water Cycle Study.	The Council are currently discussing with neighbouring authorities, utility providers and statutory consultees including the Environment Agency, Thames Water and Affinity Water whether additional evidence to support the Local Plan is required.	
36	Concern regarding proposed allocations for development on community facility sites.	The IDP will consider the need for community facilities alongside other infrastructure needs. Where the County Council has identified an existing community facilities site that it wishes to promote for development, this has been assessed through the site selection process. The Council will work with ECC to identify and deliver replacement facilities where these are required.	
	Queries and objections raised regarding the site selection process.	The Council is updating the Site Selection Methodology to take account of comments received and to set out clearly how it will consider new residential sites submitted, the reassessment of amended residential sites, employment sites and traveller sites. The updated methodology will be published on the Council's website.	
	Deliverability of the proposed allocation sites in the Draft Local Plan, including the provision for Small Sites.	The Council will be working with promoters of sites proposed for allocation in the Draft Local Plan through the Developer Forum to ensure that the sites are deliverable. The Council has made provision for a substantial proportion of the allocation to be 'small sites' (under 10 dwellings).	

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Appendix A - Key Issues identified through the Regulation 18 Consultation of the Draft Local Plan 2016

Key Issue	EFDC Response
Concerns regarding how previous consultation has been taken into account in formulating the Draft Local Plan.	Previous consultation responses, in particular the 'Community Choices' consultation carried out in 2012, were considered throughout the plan-making process and informed the draft policies, proposed site allocations, visions and objectives and spatial strategy set out in the Draft Local Plan. Previous consultation feedback was balanced with other material planning considerations, such as satisfying national planning policy requirements and taking into account the findings of more recent evidence base documents, in order to ensure that the Draft Local Plan is robust and justified.
Where new policies have been suggested, or changes to policy wording has been provided.	Comments received will be considered in the preparation of the Pre-Submission (Regulation 19) version of the Plan.
Concern that the Interim Sustainability Appraisal did not assessed enough reasonable alternative and that there is not sufficient justification for the spatial strategy.	The Sustainability Appraisal is an ongoing iterative process which informs and supports the Local Plan production. Comments received in relation to the scope of the Sustainability Appraisal will be considered and taken into account as the Sustainability Appraisal process continues.

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Summary by Settlem	ent - comments on proposed allocations	
Settlement	Summary of Comments	EFDC Response
Epping	SR-0113B (land to the south of Brook Road, Epping) and SR-0059 (land at Ivy Chimneys Road) were the two most frequently commented upon sites in Epping. Comments centred around concerns that the sites would result in higher levels of traffic on surrounding roads. There was also a relatively high number of comments realting to SR-0132Ci (Epping Sports Club and land west of Bury Lane, Lower Bury Lane). Residents expressed concern over the potential loss of a community facility on this site and wider impacts on healthy living. Other specific sites in Epping received comparatively fewer comments.	The Council has reviewed in detail all of the comments submitted during the Regulation 18 consultation in relation to the proposed site allocations included in the Draft Local Plan. Many of the concerns raised related to: lack of clarity in relation to future infrastructure provision; concern in relation to future traffic congestion; concern in relation to notential loss of car parking
Loughton	SR-0361 (Colebrook Lane / Jessel Drive Amenity Open Space) had a high frequency of comments, with residents expressing opposition to the loss of managed public open space in Loughton. SR-0226 (Loughton London Underground Car Park) and SR-0227 (Debden London Underground Car Park) were also frequently commented upon, with many expressing concern over the loss of car parking spaces and impact on commuter parking. SR-0356 (Borders Lane Playing Fields) and SR-0358 (Sandford Avenue/Westall Road Amenity Open Space) also received relatively high numbers of comments. Other specific sites in Loughton received comparatively fewer comments.	
Waltham Abbey	A relatively high number of comments were received in relation to SR-219 (Fire Station, Sewardstone Road) and SR-0541 (Waltham Abbey Community Centre, Saxon Way). Residents raised concerns that the Fire Station was an important emergency response service. Concern was expressed over the potential loss of a community facility at SR-0541. SR-0099 (Lea Valley Nursery, Crooked Mile) also received a similar level of comments, with respondents commenting that it was located on a dangerous road. Other proposed sites in Waltham Abbey received comparatively fewer comments.	
Chipping Ongar	The most frequently referenced site was SR-0848 (Chipping Ongar Leisure Centre), with many comments opposing the potential loss of this community facility that is in close proximity to the local community and Ongar Academy. Other proposed sites in Ongar received a relatively lower level of comments.	
Buckhurst Hill	All of the proposed sites in Buckhurst Hill received approximately similar levels of comments. SR-0176 (St Just, Powell Road) and SR-0225 (Lower Querens Road Car park) were commented on in relation to concern over the increase in traffic congestion and loss of car parking spaces. SR-0813 (stores at Lower Queens Road) received comments relating to the potential disruption to the local businesses currently on site.	
North Weald Bassett	The most frequently commented on site was SR-0119 (land at North Weald Airfield). Many comments were supportive of the employment deisgnation as an opportunity to expand the offer of the airfield. The number of comments on other specific sites was relatively lower, with the next highest comments received relating to SR-0158A (land north of Vicarage Lane).	
Chigwell	By far the most comments were received on SR-0557 (the Limes Estate), with respondents concerned over the loss of open space and impact on local roads. Other proposed sites in Chigwell had a lower number of comments, with SR-0551 (Olympic Compound Site) and SR-0560 (Chigwell Civic Amenity Site) receiving the least.	
Theydon Bois	The sites in Theydon Bois all received similar levels of comments in the course of the Regulation 18 consultation. Key issues raised by respondents included the loss of Green Belt land and concern that the sites proposed in particular to the east of the railway line would feel seperate to the existing settlement.	

Summary by Settlement - comments on proposed allocations					
Settlement	Summary of Comments	EFDC Response			
Roydon	SR-0197 (land adjaqcent to Kingmead, Epping Road) was the most frequently commented on proposed site in Roydon, with respondents commenting on the loss of Green Belt land and the lack of pavements for pedestrians to use to get to the centre of Roydon. Other proposed sites received a relatively low level of comments.				
Nazeing	SR-0011 (St Leonards Road) and SR-0300 (land south of Nazeing) received a similar level of comments, with other proposed sites in Nazeing receiving comparatively few comments. Respondents commented on their experiences of the St Leonards Road site flooding, and the impact of future planned development on traffic congestion. Comments regarding SR-0300 mainly related to the loss of Green Belt land.				
Thornwood	Thornwood has one proposed residential site allocation of SR-0149 (Tudor House, High Street), with respondents primarily commenting on the increase in traffic congestion from the site.				
Coopersale, Fyflied, High Ongar, Lower Sheering, Moreton, Sewardstonebury, Sheering and Stapleford Abbotts	Sites that received a high frequency of comments included SR-0405 (Coopersale Cricket Club and Coopersale and Theydon Garnon Primary School Playing Fields), with respondents concerned over the potential loss of open space and a well-used community facility. Other sites were SR-0073 (east of the M11) in Sheering due to the current levels of traffic congestion, and SR-0394 (land to east of High Ongar) with respondents commenting that High Ongar did not have the demand for such a large employment site.				





1 Executive Summary

Epping Forest District Council is producing a new up-to-date Local Plan, which will set out the plans and policies that will guide development in Epping Forest District up until 2033. A Community Visioning Consultation in 2010 and 2011, followed by subsequent evidence gathering and an Issues and Options consultation (Community Choices) undertaken in 2012, has informed the Draft Local Plan. Following agreement by Epping Forest District's Full Council on the 18th October, the Draft Local Plan was published for a six-week consultation between 31st October and 12th December 2016.

The Draft Local Plan is being reviewed and revised against the feedback received to this consultation and further evidenced gathered. The Local Plan that Epping Forest District Council intend to submit for external examination will then be published for a six-week period. There will be an opportunity at this stage to make representations on the 'soundness' of the Local Plan. The Council will then submit the Draft Local Plan to the Planning Inspector for Independent Examination, before it is adopted by Epping Forest District Council.

Epping Forest District Council undertook a number of consultation activities to let people know about the Draft Local Plan, the public consultation, and how they could get involved. Promotion of the Draft Local Plan took place between 15th September – 7th November 2016 and consultation and feedback during 31st October – 12th December 2016. As such, the following engagement was achieved:

- 3,387 responses were received from 3,082 respondents.
- 7% of feedback was received through the hardcopy questionnaires; 22% by letter, 23% by email and 48% by online questionnaires.
- 1,233 people attended the six staffed exhibition events.
- Nine e-bulletins were issued with an 'open rate' of 6,327 in total, along with 3177 direct engagements on Twitter and 1,211 engagements on Facebook.

This document provides quantitative and qualitative analysis of the feedback received to the consultation. Whilst this document will go into detail regarding the different policy areas of the Draft Local Plan, the ten most frequent comments made are listed below.

Ten frequent comments overall – all forms of feedback

- The policies and proposals of the Draft Local Plan will result in an increase in traffic congestion on local roads
- An overall opposition to principle of development in the Green Belt
- The policies and proposals of the Draft Local Plan will result in a negative impact on local schools
- The policies and proposals of the Draft Local Plan will result in increased pressure on the local healthcare provision
- The policies and proposals of the Draft Local Plan will result in a loss of car parking spaces, and increased car parking pressure
- Comments regarding Draft Policy P 2 Loughton/Loughton Broadway.
- The Draft Local Plan lacks sufficient information about the infrastructure requirements of Epping Forest District



- The policies and proposals of the Draft Local Plan will result in a negative impact on the character of the settlement
- The policies and proposals of the Draft Local Plan will result in increased overcrowding on the Central Line
- The policies and proposals of the Draft Local Plan will result in a loss of open space in the urban areas of the District

1.2 Overall vision, spatial strategy and distribution of housing – summary of issues raised

There was a low level of objection to the Draft Local Plan's vision and objectives within the Draft Local Plan. Generally, respondents supported the vision and objectives outlined, but did not consider the Draft Local Plan policies would deliver on these. Comments most frequently made were that the Draft Policies would not deliver on the intended protection of the Green Belt and the environment, would increase pressure on what is perceived to be overstretched local infrastructure, would damage the character of the area, and did not reflect the reality that residents experience in the District.

Many felt that the proposed distribution of housing would not deliver on the vision and objectives of the Draft Local Plan, and instead was looking at short term, easy solutions. It was also suggested that there was insufficient justification to 'breach' the Green Belt boundaries, and some settlements had been overlooked at the expense of sites promoted by developers, Green Belt sites and public open spaces. There was support in principle for the allocation of brownfield sites that are located in sustainable locations, particularly those with strong existing transport connectivity.

Other comments considered the Draft Local Plan would not deliver on sustainability. Some respondents felt that developing in the Green Belt and on public open spaces is not sustainable, as they are further away from settlements with sufficient facilities, and it could damage wildlife habitats. This was coupled with the concern that Draft Policies proposed to deliver new homes without a clear plan on how and where new infrastructure to support the growth will be delivered.

Responses from Statutory Consultees and local organisations were generally supportive of the values represented in the Draft Vision and Objectives and Draft Policies SP 1 and SP 2. Many Town and Parish Councils did not agree with the distribution of housing set out in the Council's spatial strategy. The loss of green belt land was commented upon by the London Green Belt Council and Campaign for Rural England.

Responses from site promoters expressed the view that further site allocations would be needed to meet the full Objectively Assessed Housing Need (OAHN) as set out in the Strategic Housing Market Assessment (SHMA). There were some queries regarding how the distribution of growth was informed by the Council's evidence bae such as the Settlement Hierarchy Technical Paper, Green Belt Stage 2 and responses to the Community Choices consultation.

1.3 Green Belt and District Open Land – summary of issues raised

The Green Belt was one of the most frequent issues raised, and was an opposing argument of respondents across the majority of the policies proposed. The main concern was over the principle of development in the Green Belt. Residents highlighted the importance of the Green Belt to them, arguing that, not only does the Green Belt help to protect the District's rural character (a key attraction to living in the area), it also prevents the merging of settlements and becoming another suburb of London.

Although there was recognition that there is a need for new homes, respondents suggested there were alternatives available (such as a 'new town' or exhausting all Brownfield sites).

There was some concern expressed over the approach to and loss of green belt land, the demonstration of exceptional circumstances and the District Open Land designation by the London Green Belt Council and



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Town and Parish Councils. Statutory Consultees and local organisations that stated support for Draft Policy SP 5 noted that it was in clear compliance with the NPPF.

Responses from site promoters stated support for limited Green Belt release to support the housing need in the district. Some respondents felt that the Council should release further Green Belt land to meet the full OAHN identified in the SHMA. Many site promoters provided alternative Green Belt reviews for their site and felt that the Green Belt Review Stage 2 was not robust or consistent.

Housing and Traveller site development - summary of issues raised

The main focus of comments on housing were in relation to Draft Policy H 4 Traveller Site Development. Respondents were of the view that proposed new traveller sites are overly concentrated in North Weald Bassett and Roydon.

Statutory Consultee and local organisation comments were generally supportive of the housing policies included in the Draft Local Plan, with many respondents making suggestions as to how the policies could be strengthened further to support a sustainable housing mix and tenure in Epping Forest District. In relation to Draft Policy J 4, Essex County Council suggested referencing transit site provision and the Lee Valley Regional Park questioned the sequential approach in relation to the pressure on traveller sites in the Green Belt.

The majority of site promoter responses were in relation to draft Policy H 2. The majority supported the affordable housing requirement set out in the policy, however those who disagreed with the requirement felt it was too high and that 40% should be a target and not a minimum.

1.5 The Economy and Town Centres – summary of issues raised

Draft Policy E 1 received some support for the local job opportunities it represents, but, this was tempered by the concern that there could be an increase in traffic on local roads, especially HGVs on rural roads. Respondents generally welcomed the support Draft Policy E 2 offered to local shops and services, especially in Waltham Abbey, Loughton Broadway and Epping. These towns were considered to need additional investment. Concerns were raised about the potential negative implications of the wider Draft Local Plan proposals on local shops; increased traffic on high streets and reduced car parking numbers which could make town and district centres unattractive places to visit.

Statutory Consultees and local organisations drew attention to the importance of retaining current employment sites and ensuring that new employment provision is joined up with housing provision. The Lee Valley Task Force commented that unsuitable employment sites should not be expanded. Draft Policy E 3 was welcomed by the Lea Valley Growers Association, Essex County Council and the Lee Valley Regional Park Authority in particular. Draft Policy E 4 was welcomed by some Town and Parish Councils and tourist attractions such as the Royal Gunpowder Mills.

Responses from site promoters were mainly in relation to Draft Policy E 1, with comments outlining that more information was needed on the amount of employment floorspace needed and the locations of future employment sites.

1.6 Transport - summary of issues raised

Transport and increased traffic was a common concern raised with many commenting on the need for adequate transport links and services to be in place before new development in the District is complete. Many responses to Draft Policy T 1 recognised the District's position in proximity to London, and the subsequent transport links that it is afforded due to its location, making it a desirable place to live.

The need to provide improved infrastructure for cycling and additional public transport was generally supported but there was criticism the policies and proposals in the Draft Local Plan do not do enough to



improve roads and cater for the high number of car users in the District. Responses to Draft Policy T 2 were supportive of Epping Forest District Council investment in key highway measures to meet future demand.

Essex County Council, Highways England and Transport for London all supported the commitment to encouraging a modal shift in the district. Transport for London confirmed that Central Line capacity should not act as a barrier to future housing development in Epping Forest district. Town and Parish Councils and local organisations expressed concern that there were no parking standards included in the Draft Local Plan.

There were relatively few comments from site promoters on Draft Policies T 1 and T 2, the details of the comments are set out in Chapter 10.

1.7 Natural Environment and Green Infrastructure – summary of issues raised

There was a low response rate to the policies for natural environment and green infrastructure. Responses to Draft Policy SP 6 generally supported the importance of the natural environment to the District, particularly the positive impacts these have on mental and physical wellbeing. Many comments focussed on the impact of the proposals to develop on public open space in the District, particularly in urban areas.

Statutory Consultees and local organisations welcomed the inclusion of policies relating to the natural environment and green infrastructure in the Draft Local Plan. In particular, the Lee Valley Regional Park Authority suggested a standalone policy that incorporated the strategic policies set out in the Authority's plan. The Environment Agency advised that there should be further mention of blue infrastructure.

Responses from site promoters expressed the view that it needed to be clearer what the requirements were for Suitable Accessible Natural Greenspaces and open spaces. Responses were generally supportive of policies on the Natural Environment included in the Draft Local Plan.

1.8 Historic Environment, Design and Place Shaping – summary of issues raised

Comments received on the Historic Environment, Design and Place Shaping highlighted the importance of heritage assets to the community of Epping Forest District, and the need to ensure that the design of new development considers their context and architectural style, particularly in conservation areas.

Draft Policy SP 4 was welcomed in particular by Sport England and Harlow District Council for its promotion of healthy and active lifestyles and garden city principles. The Campaign for Rural England suggested the inclusion of a Design Review Panel, and Essex County Council suggested that more mention was given to zero carbon buildings in the design policies included in the Draft Local Plan.

There were relatively few comments from site promoters on policies in Chapter 12. Site promoters outlined that more detail was needed on what requirements there are for developers in relation to Draft Policy DM 9; and that the requirements set out in Draft Policy DM 10 should only apply where the impact on viability has been considered. The majority of respondents that commented on Draft Policy SP 4 indicated they were supportive and intended to work positively with the Council to bring forward place shaping principles.

1.9 Climate Change and Environmental Policies – summary of issues raised

This chapter included responses to the Interim Sustainability Appraisal (SA), which was felt to be important to ensuring sustainable development in the District. Key topics in the responses regarding the SA focussed on the impact of new development on the local transport infrastructure. It was also felt, by some, that development on the Green Belt and on open public spaces contradicted the approach that Epping Forest District Council was seeking to take towards sustainability – although there was some recognition of the need to balance the need to protect the Green Belt and provide new homes.

There was general agreement with Epping Forest District Council's stated approach to flood management and drainage systems within the Draft Local Plan. There was also general support regarding the approach to



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renewable energy technologies, but with clarification that the approach might be too prescriptive for future developers of a site.

North Weald Bassett Parish Council and Moreton, Bobbingworth and the Lavers Parish Council stated their support for the flood risk policies included in the Draft Local Plan in the context of a history of flood related issues in their respective areas. Thames Water and Anglian Water expressed support for Draft Policy DM 18 and Draft Policy DM 16 in particular. The Environment Agency gave policy wording suggestions to many of the policies in this section.

There were relatively few comments from site promoters on the policies on climate change and the environment, the details of the comments can be found in Chapter 13.

1.10 Infrastructure Delivery – summary of issues raised

Concern regarding existing infrastructure, and the impact on it of future development, was one of the most frequent comments raised, with respondents agreeing that it is important to ensure that 'necessary' infrastructure is provided to support new development. Traffic congestion concerns ranked highly, alongside increased pressure on schools, capacity of GP surgeries, lack of car parking spaces and increased overcrowding on the Central Line.

It was felt that there needs to be more information within the Draft Local Plan about when infrastructure would be delivered, where and how. It was felt there needed to be more certainty and consistency for each allocation to allow respondents to feel confident that infrastructure would be provided to support the increase in population in each settlement.

It was widely appreciated among Statutory Consultees and local organisations that there is further work to be completed on infrastructure that will detail the infrastructure required to support the draft site allocations. Essex County Council and neighbouring authorities welcome future co-operative working on infrastructure matters.

Responses from site promoters commented that there was not enough detail on infrastructure in the Draft Local Plan in relation to Draft Policy D 1. In particular it was felt that the infrastructure needed for each site should be outlined. Many site promoters commented on Draft Policy D 6, with the majority commenting in relation to the Chigwell Neighbourhood Plan.

1.11 Places – summary of issues raised

Amongst the 12 'place' policies within the Draft Local Plan, Loughton received the highest number of comments, followed by Theydon Bois, Epping, North Weald Bassett and Chigwell. Statutory Consultees and local organisations made comments in relation to some of the Places policies, of which the key points have been presented in Chapter 15. The themes within the feedback to Draft Policy SP 3, Draft Policy P 1 to P 12 were:

Draft Policy SP 3 received a proportionally higher level of support amongst respondents compared to the other 'place' policies. Respondents generally supported the proposals for development around Harlow, viewing it as a suitable location to absorb growth. Respondents also considered the strategic sites around Harlow as being a better alternative than increased housing figures within the settlements of Epping Forest District.

General concerns were centred on an overall objection to development within the Green Belt and the impact upon the surrounding villages, which could result in merging of Roydon, Nazeing and North Weald Bassett with Harlow.

Some respondents stated they would prefer growth to be accommodated within a new town, rather than across multiple development sites and that this would be a more sustainable form of development.



Draft Policy P 1 Epping responses related to traffic congestion and how this would be exacerbated when the proposed allocated sites in Epping are developed. Epping High Street, Brook Road, Bridge Hill, Ivy Chimneys Road were referenced as roads that experience high levels of traffic. The proposed allocation site of SR-0113B, land to the south of Brook Road, Epping and SR-0069, Land at Ivy Chimneys Road raised concerns due to potential impacts on the local highways network. Some respondents felt there was a disproportionate level of growth being placed in Epping.

Draft Policy P 2 **Loughton** received a large number of comments The most frequent comments were related to the concern that there would be an increase in traffic congestion within Loughton, and about the loss of public open space with the proposed site allocation of SR-0361, Colebrook Lane / Jessel Drive Amenity Open Space. It was felt that the loss of this open space could result in a negative impact on the quality of life of residents.

Draft Policy P 3 Waltham Abbey received a low level of response. The sites most frequently commented on were SR-0219 (Fire Station, Sewardstone Road) and SR-0541 (Waltham Abbey Community Centre, Saxon Way). Respondents were concerned that the Fire Station and Community Centre would not be replaced within Waltham Abbey once developed.

Draft Policy P 4 Chipping Ongar responses focused on the view that the proposed allocations in Chipping Ongar were disproportionate in comparison to other settlements. Many comments expressed a view that that this could lead to a change in character of the settlement, would impact on the Green Belt and there was a perceived lack of infrastructure or facilities to accommodate such a large increase in population. The site most frequently referenced was proposed allocation site SR-0848, Chipping Ongar Leisure Centre, with many opposing the loss of this community facility.

Draft Policy P 5 Buckhurst Hill responses related to the proposed allocation of sites SR-0176 (St Just, Powell Road) and SR-0225 (Lower Queens Road Car Park). Respondents felt that development of these sites would increase the pressure on car parking in Buckhurst Hill, and there was concern about the impact of this, alongside the construction disruption to shops on Lower Queens Road, which was felt to have a long lasting negative impact on their customer base.

Draft Policy P 6 North Weald Bassett responses ncluded views that the level of growth proposed was disproportionate in comparison to the size of North Weald Bassett, and the level of development proposed in other settlements. Respondents disagreed with development on the Green Belt in North Weald Bassett, suggesting that it would negatively impact the character of the settlement and damage the quality of life of residents. In addition, it was raised the Green Belt acts as a buffer to flooding in the settlement, and it was felt that increased hardstanding could increase the likelihood of flooding.

Draft Policy P 7 Chigwell many responses referenced the site selection of SR-0557 (the Limes Estate). Respondents were concerned about the loss of open space on the Limes Estate and felt that managed public open space in Chigwell was being selected at the expense of other rural sites in the District. Some responses stated a preference for the direction of growth set out in Chigwell Parish Council Neighbourhood Plan.

Draft Policy P 8 Theydon Bois responses included views that the number of homes was too high for the village and would significantly increase the local population, with comments suggesting that local infrastructure is unable to cope with the current population. Some questioned why there was such a focus on the towns along the Central Line and queried the sustainability of developing on Green Belt sites in settlements without adequate infrastructure or facilities.

Draft Policy P 9 Roydon There were fewer comments on this policy in comparison to other place policies. Responses picked up on concerns regarding increased traffic congestion in the village, which would be exacerbated by the level crossing in the village and the use of rural roads by HGVs. The potential merging of Roydon with Harlow was also a key concern.



Draft Policy P 10 Nazeing response included a high frequency of comments that raised concerns regarding the traffic impact of the proposals. Concerns centred on congestion being exacerbated due to the population growth, but also the recent removal of bus services and the lack of a train station. Pressure on utilities was also raised as an ongoing issue in the village, in the context that it would not be able to cope with increased use.

Draft Policy P 11 Thornwood Some respondents saw an increase in population as an opportunity to deliver facilities for the village and to encourage a balanced community through delivery of homes for the retention of younger residents. A concern suggested that the village already experiences high levels of congestion due to the proximity to Harlow, the M11 and the M25, and as such, suffers from pollution because of this proximity.

Draft Policy P 12 other settlements Responses expressed some concern that the proposed site allocations represented a large increase in population for the villages, which was not felt to have the infrastructure to cope with this increase; that development on Green Belt sites does not reflect the objectives of the Draft Local Plan to protect the Green Belt and environment; and that the scale of development and its location on Green Belt sites would change the character of the villages and could lead to the eventual merging of settlements. However, it was also felt that this growth could promote self-sustainability of local businesses in the villages from an increased population.

Report to the Cabinet

Report reference: C-009-2017/18
Date of meeting: 11 July 2017



Portfolio: Leader of Council

Subject: Transformation Programme - April and May 2017 Highlight

Report

Responsible Officer: David Bailey (01992 564105).

Democratic Services: Gary Woodhall (01992 564470).

Recommendations/Decisions Required:

(1) That the progress of Projects and Programmes for April and May 2017 be noted, alongside planned actions for June 2017.

Executive Summary:

Regular highlight reports on the progress of the Transformation Programme are presented to the Cabinet. This is the highlight report for April and May 2017 and covers progress for all chartered projects of Medium and High Risk Potential, as well as key aspects of the Transformation Programme.

Overall, progress indicators for 'cost' and 'benefits' were Green for this period. The status indicator for 'time' is reported as Amber to highlight that 1 action (from a total of 216) was overdue when compared with planned timelines. The status indicator for 'Delivery / outcome / output' is reported as Amber to highlight that 3 projects require progress report updates. Project and Programme Managers have actions in place to deal with any potential negative effects. Progress will be kept under review and it is anticipated that the status of the majority of these items will return to Green in the next report.

Reasons for Proposed Decisions:

To inform Cabinet of progress on the Transformation Programme, including workstreams, programmes and projects.

Other Options for Action:

No other options are available. Failure to monitor and review progress of the Transformation Programme and to consider corrective action where necessary, could have negative implications for the Council's reputation, and may mean the opportunities for improvement were lost.

Report:

1. This is the April/May 2017 Highlight Report for the Transformation Programme. The format of the report has evolved in order to remain an effective tool for highlighting progress, slippage and remedial actions being taken.

- 2. The report covers progress for the 39 chartered 'live' projects with Medium or High Risk Potential, as well as progress on key aspects of the Transformation Programme.
- 3. The Cabinet is requested to review progress for April and May 2017, alongside actions scheduled for the next period and any remedial actions being undertaken.
- 4. The highlight report uses the RAG rating, based on Red, Amber and Green colours used in a traffic light system. The definitions of the RAG ratings are:

Light	Definition	Action	
	There are significant issues with the project, programme or workstream.		
Red	The project requires corrective action to meet business objectives. The issue cannot be handled solely by the project manager or project team. The matter should be escalated to the project sponsor and Transformation. Programme Board		
	One or more aspects of project viability – time, cost, scope – exceed tolerances set by the Transformation Programme Board.	immediately.	
	A problem has a negative effect on project performance but can be dealt with by the project manager or project delivery team.	The Transformation	
Amber	Action is taken to resolve the problem or a decision made to watch the situation.	Programme Board should be notified using a progress	
	One or more aspect of project viability – time, cost, scope – is at risk. However, the deviation from plan is within tolerances assigned to the project manager.	report or scheduled briefing with the sponsor.	
	The project is performing to plan.		
Green	All aspects of project viability are within tolerance. However, the project may be late or forecast to overspend (within tolerance).	No action needed.	

- 5. Overall, progress indicators for 'cost' and 'benefits' were Green for this period. The status indicator for 'time' is reported as Amber to highlight that 1 action (from a total of 216) was overdue when compared with planned timelines. The status indicator for 'Delivery / outcome / output' is reported as Amber to highlight that 3 projects require progress report updates.
- 6. Project and Programme Managers have actions in place to deal with any potential negative effects. The deviation from plans for the majority is within tolerances, most often within one calendar month. It is anticipated that the status of the majority of these items will return to Green by the end of the next period and progress will be kept under review.
- 7. Appendix 1 contains the highlight report for April/May 2017. Any project closures are also noted.

Resource Implications:

Resource requirements for actions to achieve specific outcomes or benefits will have been identified by the Transformation Programme Board and reflected in the budget for the year.

Legal and Governance Implications:

There are no legal or governance implications arising from the recommendations of this report. Relevant implications arising from actions to achieve specific outcomes or benefits will have been identified by the Transformation Programme Board.

Safer, Cleaner and Greener Implications:

There are no implications arising from the recommendations of this report in respect of the Council's commitment to the Climate Local Agreement, the corporate Safer, Cleaner and Greener initiative, or any crime and disorder issues within the district. Relevant implications arising from actions to achieve specific projects will have been identified by the Transformation Programme Board.

Consultation Undertaken:

Progress has been reviewed by the Transformation Programme Board.

Background Papers:

Progress submissions and relevant supporting documentation is held by the Programme Management Office (PMO).

Risk Management:

There are no risk management issues arising from the recommendations of this report. Relevant issues arising from actions to achieve specific projects will have been identified by the Transformation Programme Board.



Equality analysis report

Step 1. About the policy, service change or withdrawal

Name of the policy, service or project: be specific	Transformation Programme – April-May 2017 Highlight Report
Revised / new / withdrawal:	New
Intended aims / outcomes/ changes:	That the Cabinet note the progress of Projects and Programmes for April-May 2017
Relationship with other policies / projects:	All
Name of senior manager for the policy / project:	Glen Chipp, Chief Executive
Name of policy / project manager:	David Bailey, Head of Transformation

Step 2. Decide if the policy, service change or withdrawal is equality relevant

Does the policy / project / service process involve, or have consequences for employees or other people? If yes, please state who will be affected. If yes, then the policy / project is equality relevant.	If yes, state which protected groups:
If no, state your reasons for this decision. Go to step 7.	If no, state reasons for your decision:
The majority of Council policies and projects are equality relevant because they affect employees or our communities in some way.	No. Any equalities impact assessment for individual projects or programmes is detailed on the respective reports.

Name and job title of officer completing this analysis:	David Bailey, Head of Transformation
Date of completion:	16.06.2017
Name & job title of responsible officer: (If you have any doubts about the completeness or sufficiency of this equality analysis, advice and support are available from the Performance Improvement Unit)	David Bailey, Head of Transformation
Date of authorisation:	16.06.2017
Date signed copy and electronic copy forwarded to PIU equality@eppingforestdc.gov.uk	16.06.2017

Transformation Programme Highlight Report

Report	Period
16-17	April and May 2017

Approval

Approved for submission to the Cabinet (Sponsoring	Transformation Programme Board	Date	16.06.2017
Group), given by			

Distribution list

Name	Job title	Directorate / Department	Organisation
Membership	Transformation Programme Board	-	EFDC

Overall transformation programme progress and status

	RAG s	status	Comment on overall progress and status and recommended actions
	This period	Last period	Comment on overall progress and status and recommended actions
Time	Amber	Amber	1 action is overdue out of a total of 216 actions
Cost	Green	Green	
Delivery / outcome / output	Amber	Amber	3 projects require progress report updates
Benefits	Green	Green	

Accountabilities and information flow: Project closures

Workstream / Project	Progress to report	Actions for next period	Due	Owner
	None			

Highlight: Overdue actions for this period and remedial actions for the next period

Key Benefit	Actions Overdue	Planned Date	Remedial Actions	Due Date	Owner
Workstream 2 – Business					
P105 Civic Office Waste					
 Increased recycling rates. Decreased waste-to-landfill rates. Decreased costs to EFDC 	Review recycling rates for first quarter of implementation Monitor how the recycling is progressing and answer staff questions (To continue monthly for 3 to 4 months)	30-Jun-2017	PMO to seek update from project manager	30-Jun-2017	Elizabeth Ainslie, Environmental Co- ordinator
	Spot-checks of bins to be carried out				
P124 Corporate and Busi		45 1 0047	T-5:	00.1.0047	
 Improved Corporate Plan Key Action Plan (SMART). 	Directorate business plans signed off by Portfolio Holders.	15-Jun-2017	Directorates have business plans signed off by Portfolio Holders	30-Jun-2017	Alan Hall, Director of Communities
 Improved clarity across directorate business and service plans. 					
 Improved outcomes, benefits realisation and Council performance, through the delivery of the Corporate Plan. 					

Key Benefit	Actions Overdue	Planned Date	Remedial Actions	Due Date	Owner		
P020 Legal Document So	P020 Legal Document Scanning						
 Improved access to digital versions of records, to support flexible and mobile working 	Progress report unavailable due to staff absence	30-Apr-2017	PMO obtain progress report by oral interview with officer covering department. Officer to be trained to update Covalent going forward	30-Jun-2017	Colleen O'Boyle, Director of Governance Gareth Nicholas, Senior Project Improvement Officer		
P125 Off-Street Parking Review							
 Cost saving for the provision of off street parking 	Successful completion of project and evaluation	30-Apr-2017	Complete finance outturn for project closure	30-Jun-2017	Amanda Hoadley, Car Park & Street Furniture Mgr Support Officer		

Document control

Version	Date	Status (draft, approved)	Author	Change description
1.0	16.06.2017	April-May draft	Monika Chwiedz, Performance Improvement Officer	Draft
2.0	16.06.2017	April-May draft	Gareth Nicholas, Senior Project Improvement Officer	Report
3.0	16.06.2017	April-May draft	David Bailey, Head of Transformation	Amends

*** End of Report ***

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Agenda Item 14

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

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