

2nd December 2019

Planning Directorate
Civic Offices, 323 High Street,
Epping, Essex CM16 4BZ

Georgina Blakemore
Chief Executive:

Planning Policy Team
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Dear Sir or Madam,

Consolidated and Updated Viability Evidence

Epping Forest District Council (EFDC/the Council) is at an advanced stage of preparation of its Local Plan. The Local Plan Submission Version 2017 (LPSV) was submitted for Independent Examination in September 2018 and hearing sessions were held between February and June 2019. The LPSV sets out the approach and detailed policies including the future distribution of housing growth; requirements for affordable housing; and the future distribution for new employment land. The Local Plan Inspector's advice following the hearing sessions and the Council's subsequent response can be viewed at: <http://www.efdclocalplan.org/local-plan/inspectors-advice/>. Further work is now being undertaken particularly in relation to an updated HRA in order to agree the main modifications which will then be the subject of consultation.

The 2019 National Planning Policy Framework (2019 NPPF) and the updated Planning Practice Guidance (PPG) have altered the way viability is considered at the development management stage of the planning process. An important element of this is that a viability assessment submitted to accompany a planning application '*should be based upon and refer back to the viability assessment that informed the plan*'. The Harman Advice (Viability Testing Local Plans) also puts considerable emphasis on stakeholder engagement and consultation, particularly with members of the development industry.

At the Local Plan Examination Hearing Session on Matter 14 – Infrastructure & Delivery – Epping Forest District Council made a commitment to the Local Plan Inspector that its viability documents would be updated and consolidated. The Council has therefore commissioned HDH Planning & Development Ltd to undertake the viability assessment work taking into account recent guidance. The purpose of this work is to make the existing Viability Study (EB301) clearer and more accessible as part of the submitted Local Plan evidence base and to inform future decision taking by Development Management. The work to be undertaken will also supplement the existing 'primary'

IDP and key infrastructure requirements set out within the LPSV, and represents the iterative and ongoing nature of infrastructure planning, far exceeding the basic requirements within national planning policy and guidance. The Council considers that the further work has been and continues to be informed by appropriate engagement and consultation with stakeholders, and that policies within the LPSV already provide sufficient flexibility to enable applicants and decision makers to reflect and respond to changing circumstances, including changing viability considerations.

Following the Developer Forum on Viability on 26 November 2019 where the methodological approach to the updated viability evidence and key assumptions were presented, the Council is consulting on the draft consolidated and updated viability report which can be viewed on our website. The consultation will enable all stakeholders to have an input and provide comments into this work. Your input into this consultation is important to ensure the approach taken to viability in the study is proportionate and deliverable. Following consideration of the comments received a consolidated and updated viability assessment will then form a material planning consideration that is given weight in decision taking by the Local Planning Authority.

Please could all comments/suggestions be submitted in writing by email to implementationteam@eppingforestdc.gov.uk no later than close of business on Monday 6 January 2020.

Yours sincerely,

**Implementation Team
Epping Forest District Council**