

EPPING FOREST CONSTITUENCY LABOUR PARTY
Chairman Simon Bullough

Secretary Mitch Diamond-Conway



26 January 2018

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Representation re: efdclocalplan.org/submission-version-2017

“Focus of representations” as detailed in EFDC’s undated letter delivered December 2017

1. Duty to cooperate.
2. Relevant Legal requirements
3. Whether the local plan 2017 is sound.

Responses

1. Duty to cooperate

A consultation process has taken place starting 2010/11 spanning 5/6 years in which time representations have been made. Although this consultation has been conducted, residents feel that their strength of feeling has not been acknowledged in the final submission with reference to:-

1a. Residential building on open amenity spaces within already existing areas of high density housing, particularly within Loughton and Chigwell. See Appendix 1

1b. Concerns regarding traffic movements e.g. Loughton High road – South to North, Ivy chimneys/Bell Common junction near Epping, Fencepiece Road/Manor Road in Chigwell and Palmerston Road Buckhurst Hill.

1c. Access to medical, educational and transport facilities. The 2017 submission plan is lacking in detail.

1d. A lack of consideration has been given to residential, commercial and commuter parking with specific reference to Epping and the southern part of the district.

1e The decline of existing retail. Given that it has been generally acknowledged that there has been a reduction in retail footfall nationally, and in view of the fact that further retail development has been approved during the production of the plan, no resolution has been put forward within the document to address the resultant problems and ensure the viability of town centres particularly in the South of the district. Retail areas have been left to decline.

1d and 1e above has in some places within the district led to a deep mistrust in town centre management and the planning process.

In addition

1f. Given that the first draft of the plan was published in 2012, but previous negotiations had taken place dating back to before 2010, the submission document as presented to Epping Forest District Council on 14 December with only a six week period for representation which included three bank holidays is not considered to comply with the duty to cooperate. The 2017 plan could and should have been produced and presented much earlier.

"We are on schedule to deliver the plan to the inspectorate before the end of March 2018 deadline. By doing this we will be able to continue to make use of our extensively researched housing requirement. To fail to do this will expose us to the risk of the housing requirement rising from 11,400 to over 20, 000 homes by 2033". Plan page V Foreword by Cllr Chris Whitbread, Leader of the Council and Cllr John Philips, Planning and Government Portfolio Holder.

The veiled threat within this statement does not give the impression that the 2017 Plan has been presented in a spirit of cooperation. No supporting evidence for the increase in residential units has been given.

1. Duty to cooperate and 2. Relevant legal requirements.

Gov.uk Ministry of Housing, Communities and Local Government. Brownfield Registers.
See Appendix 2

"The proposal came into force in mid April 2017. Local authorities will be expected to have compiled their registers by the 31 December 2017".

Preparing a register

item 6 Who will prepare brownfield register?

Local planning authorities who are required to develop a Local Plan under Part 2 of the Planning and Compulsory Purchase Act 2014 will be required to have a register covering the area of the local plan."

At the time the Epping Forest District Local Plan Submission Version 2017 was put before Council on the 14 December 2017 the above mentioned register of brownfield sites was not available and is not available to date. As a consequence it should be considered that the

location of sites put forward for development is unacceptable due to the lack of possible alternatives.

3. Whether the local plan 2017 is sound.

In light of the responses above the Epping Forest District Local Plan Submission Version 2017 should be categorised as unsound. In particular with reference the lack of a brownfield register which could have both informed and made more acceptable the placing of residential units.

It is felt that only Epping Forest District Council can provide solutions to the above responses so that the document can be deemed both sound and acceptable to residents and traders.



Jessel Green Masterplan Area LOU R5

GOV.UK **Brownfield land registers**

From: Ministry of Housing, Communities & Local Government

Part of: Planning practice guidance and Planning system

Published: 28 July 2017

Guidance to support local planning authorities in preparing and publishing brownfield land registers.

The purpose of brownfield land registers

What is the purpose of brownfield land registers?

Brownfield land registers will provide up-to-date and consistent information on sites that local authorities consider to be appropriate for residential development having regard to the criteria set out in regulation 4 of the Town and Country Planning (Brownfield Land Register) Regulations 2017. Local planning authorities will be able to trigger a grant of permission in principle for residential development for sites in their registers where they follow the required procedures. Registers will be in two parts, Part 1 will comprise all brownfield sites appropriate for residential development and Part 2 those sites granted permission in principle. Registers should be published locally as open data and will provide transparent information about suitable and available sites.

Paragraph: 001 Reference ID: 59-001-20170728

Revision date: 28 07 2017

What are local planning authorities required to do?

Regulation 3 of the Town and Country Planning (Brownfield Land Register) Regulations 2017 requires local planning authorities in England to prepare, maintain and publish registers of previously developed (brownfield) land by 31 December 2017. Brownfield sites that meet the relevant criteria must be entered in Part 1 of brownfield land registers. Sites entered in Part 2 of the brownfield land registers are granted permission in principle. Regulation 17 requires local planning authorities to review their registers at least once a year.

Paragraph: 002 Reference ID: 59-002-20170728

Revision date: 28 07 2017