

Response to Epping Forest District Council Draft Local Plan Regulation 19 Consultation 2018

Representations of Chigwell Residents Association

Introduction

The Chigwell Residents Association (CRA) represents over 300 households and is extremely active within the village. Throughout the Local Plan process we have made representations which unfortunately have not been adhered to within the Draft Local Plan.

The CRA have also been a key consultee in the development of the Chigwell Neighbourhood Plan which has now been submitted to the inspectorate for review. As residents we whole heartily support the neighbourhood plan and would urge the inspectorate to consider this when reviewing the Local Plan.

The representation raises objections to the Submission Version of the Local Plan, which we submit in its current form fails the tests of soundness, namely:

- a) the plan is not positively prepared because the plan fails to meet objectively assessed housing needs for the area;
- b) the plan is not justified because it does not represent the most appropriate strategy, when considered against the reasonable alternatives;
- c) the plan is ineffective because it does not give confidence that the right amount of development is deliverable over the plan period with special reference to Limes Farm; and
- d) the plan is not consistent with national policy because it provides an incomplete evidence base and does not provide any evidence that the sites selected for allocation have been chosen in the pursuit of sustainable development.
- e) We believe the EFDC has failed in its duty to co-operate with neighbouring authorities namely Harlow and Redbridge.
- f) The plan suggests infrastructure improvements to accommodate the new development once again the plan provides no evidence to support this.

Therefore the Plan and its evidence base have led to a failure to allocate the most appropriate sites within the Green Belt.

Accordingly, the representation proposes an amendment to the Spatial Strategy SP2, Policy P7 Chigwell and the Proposals Map.

These responses in this representation relate directly to the questions Q6 and Q7 on the representation form and hence are labelled as such.

Representation

Objective Assessed Housing Need (paragraphs 2.41 to 2.44)

Question 6: Why the Submission Local Plan is unsound

We do not consider there to be sufficient evidence to reduce housing need from the DCLG 2014-based population projections starting point of 684 dwellings per annum for Epping Forest District. Further, no consideration has been given to the Government's standardised approach to calculating housing need, which in the case of Epping Forest District Council equates to 923 dwellings per annum.

The Pre Submission Local Plan therefore fails to satisfy the first step, as required by NPPF paragraph 159, to identify Objectively Assessed Need, based on an up-to-date and relevant evidence base.

In light of the foregoing we do not consider that Epping Forest or the Housing Market Area (HMA) authorities are meeting housing need in full across the HMA.

Therefore the Pre Submission Local Plan fails to 'meet objectively assessed needs, with sufficient flexibility to adapt to rapid change' as required by NPPF paragraph 14.

Question 7: Changes considered necessary

The Council has not explored the possibility of meeting its OAN in full within Epping Forest. We do not consider the Council's assessment OAN is robust and up to date. The Plan should be modified to ensure that the OAN is met in full.

As a minimum we consider that the DCLG 'starting point of the 2014-base House Hold Projects plus an appropriate uplift for market signals should be used in the Plan of the Council's OAN figure.

Policy SP2 Spatial Development Strategy 2011-2033

Question 6: Why the Submission Local Plan is unsound

Policy SP2 states that the Council will follow a sequential approach in respect of site allocations and housing delivery as set out in criteria (i) to (viii). This approach sets out a strategy, which does not follow the scale or sustainability of settlement types to accommodate development and is therefore unsound.

The Council has made changes in the distribution and location of allocated sites since the previous Regulation 18 consultation, but has not published the evidence to support these changes and therefore an informed assessment of the soundness of this plan cannot be undertaken.

We are concerned that the current allocations within the Submission Local Plan are focussed too heavily within the urban areas and will result in intensification of urban land that cannot be matched with infrastructure provision and will in some cases result in lost car parking areas and erode important urban open spaces currently required for recreation which present much needed relief within the urban environment. Especially with Limes Farm which is the most densely populated part of the Village and the current plan proposes an additional 100 homes.

In addition good quality agricultural land is proposed for development, which is contrary to the NPPF and should be avoided where possible.

We also note that housing allocations are proposed in villages, which do not have the infrastructure to match the level of growth that is required by this Local Plan and without a clear Infrastructure Delivery Plan in place will result in pressure on existing services.

Question 7: Changes considered necessary

Policy SP2 is currently unsound as it is not justified, positively prepared or effective. This policy should remove the references to the convent site and Limes Farm and purely refer to Chigwell Neighbourhood Plan.

Policy P7 Chigwell

Question 6: Why the Submission Local Plan is unsound

This policy should be amended to include the Chigwell Neighbourhood Plan

We are concerned that the current allocations within the Submission Local Plan are focussed too heavily within the urban areas and will result in intensification of urban land that cannot be matched with infrastructure provision and will in some cases result in lost car parking areas and erode important urban open spaces currently required for recreation which present much needed relief within the urban environment.

In addition good quality agricultural land is proposed for development, which is contrary to the NPPF and should be avoided where possible.

We also note that housing allocations are proposed in villages, which do not have the infrastructure to match the level of growth that is required by this Local Plan and without a clear Infrastructure Delivery Plan in place will result in pressure on existing services.

Question 7: Changes considered necessary

Policy P7 is currently unsound as it is not justified, positively prepared or effective.

We believe Epping Forest have failed in their duty to co-operate with neighbouring authorities namely Harlow and Redbridge. This alone we believe is enough for the inspectorate to request that plan is started again and key stakeholders are listened to.