

Stakeholder Reference:
Document Reference:

Part A

Making representation as Statutory Consultee, Local Authority or Town and Parish Council

	Personal Details	Agent's Details (if applicable)
Title	...Redacted...	
First Name	...Redacted...	
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Job Title (where relevant)	Senior Planning Officer	
Organisation (where relevant)	Chelmsford City Council	
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Part B

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph:

Policy: SP 2 Spatial Development Strategy 2011-2033

Policies Map: No

Site Reference: None of the above

Settlement:

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: Yes

Sound: Yes

If no, then which of the soundness test(s) does it fail?

Complies with the duty to co-operate? Yes

Please give details either of why you consider the Submission Version of the Local Plan is not legally compliant, is unsound or fails to comply with the duty to co-operate; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible. Please use this box to set out your comments.

Chelmsford City Council (CCC) welcomes the opportunity to comment on Epping Forest Council's Submission Local Plan to help influence the emerging document and monitor the key cross-boundary and strategic issues that affect CCC's administrative area.

Chelmsford City Council welcomes the update to Epping Forest District Council's SHMA to take account of the latest 2014-based household projections and the GLA 2016-based household projections. The Council notes that the spatial option agreed by the West Essex/East Hertfordshire Authorities to deliver approximately 51,100 new homes is slightly below the FOAN for the HMA as set out in the Strategic Housing Market Assessment Establishing the OAN July 2017 prepared by Opinion Research Services (51,700 over the period of 2011-2033). Of the 51,100, Epping Forest has agreed to provide approximately 11,400 new homes which again is less than the FOAN of 12,573 dwellings for the district.

Paragraph 47 of the NPPF requires local planning authorities to meet their full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework. Epping Forest District Council should be satisfied that it can justify the shortfall in housing numbers and should seek to make provisions to meet deficiencies within their Local Plan and/or HMA over the plan period. Any deficiencies and mechanisms to address unmet need should accord with the Essex Planning Officers' Association Guidance 'Mechanism for the Consideration of Unmet Housing Need' which was agreed by authorities across Essex. Subject to the unmet housing need being appropriately addressed, Chelmsford Council considers the Submission Local Plan to be Sound and Legally Compliant.

Please set out what change(s) you consider necessary to make the Pre Submission Local Plan legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

REPRESENTATION

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Policies Map: No

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CCC notes that Epping Forest is committed to meeting its identified need for Travellers through the provision of new plots and/or pitches including within the strategic sites.

CCC also notes that the Local Plan seeks to provide sufficient land to meet future employment development needs through the protection of existing employment sites and the allocation of new sites within strategic sites.

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REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph:

Policy: P 4 Ongar

Policies Map: Yes

Site Reference: None of the above

Settlement: Ongar

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: Yes

Sound: Yes

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Growth is proposed at Ongar and North Weald, both which are located along the A414. This could increase pressure and congestion on the A414 leading to Chelmsford.

Junction modelling concludes that at Junction 12, Four Wantz roundabout, the A414 Chelmsford Road approach would exceed capacity due to the planned development at Ongar. The IDP identifies the roundabout and categorises it as 'essential' but does not state what mitigation measures are proposed. As identified at 8.2 of the IDP, Chelmsford Council would

expect the IDP to be updated prior to submission for Examination to specify the more detailed mitigation required to support the growth of the area. As identified in the Highway Assessment Report December 2017, this should be supported by further transport modelling which is required to test the Local Plan in full.

Subject to the completion of additional transport modelling and an update to the IDP, the Chelmsford Council considers the Submission Local Plan to be Sound and Legally Compliant.

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REPRESENTATION

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Paragraph:

Policy: P 6 North Weald Bassett

Policies Map: Yes

Site Reference: None of the above

Settlement: North Weald Bassett

Do you consider this part of the Pre Submission Local Plan to be:

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Sound: Yes

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Growth is proposed at Ongar and North Weald, both which are located along the A414. This could increase pressure and congestion on the A414 leading to Chelmsford.

The additional homes and the expansion of the existing employment site at the North Weald Airport would put addition pressure on junctions to the A414. The IDP identifies improvements to Talbot PH roundabout, A414/Vicarage Rd junction; junction modelling indicates that this junction would operate above capacity over the plan period. Therefore, as set out in the IDP, improvements to this junction are essential.

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No, I do not wish to participate at oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination

Yes

Signature: **....Redacted....** Date: 25/01/2018

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Epping Forest District Council
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