



Representation form: Consultation on the Main Modifications to the emerging Local Plan

This form should be used to make representations on the Main Modifications to the Epping Forest District Local Plan Submission Version 2017 to the Local Plan Inspector. The Main Modifications Schedule, online response form and all required supporting documentation can be accessed via the Examination website at www.efdclocalplan.org. Please complete and return representations by Thursday 23rd September 2021 at 5pm.

Please note, the content of your representation including your name will be published online and included in public reports and documents.

It is important that you refer to the [guidance notes](#) on the Examination website before completing this form.

The quickest and easiest way to make representations is via the online response form at www.efdclocalplan.org.

If you need to use this downloadable version of the form please email any representations to MMCons@eppingforestdc.gov.uk

Or post to: MM Consultation 2021, Planning Policy, Epping Forest District Council, Civic Offices, 323 High Street, Epping, Essex, CM16 4BZ

By 5pm on Thursday 23rd September 2021

This form is in two parts:

Part A – Your Details

Part B – Your representation(s) on the Main Modifications and/or supporting documents. Please fill in a separate Part B for each representation you wish to make.

The Main Modifications Schedule and supporting documents to the Main Modifications can be accessed online at www.efdclocalplan.org. The supporting documents to the Main Modifications are listed below. Representations concerning their content will be accepted to the extent that they are relevant to inform your comments on the Main Modifications. However, you should avoid lengthy comments on the evidence/background documents themselves.

- A. Council's response to Actions outlined in Inspector's post examination hearing advice (Examination document reference number ED98), July 2021 (ED133)
- B. Sustainability Appraisal Report Addendum, June 2021 (June 2021) (ED128/ EB210)

- C. 2021 Habitats Regulations Assessment, June 2021 (ED129A-B/EB211A-B)
- D. Epping Forest Interim Air Pollution Mitigation Strategy, December 2020 (ED126/ EB212)
- E. EFDC response to Inspector's Post Hearing Action 5 and supplementary questions of 16 June 2021, July 2021 (ED127)
- F. Epping Forest District Council Green Infrastructure Strategy (ED124A-G/ EB159A-G)
- G. Harlow and Gilston Garden Town Latton Priory Access Strategy Assessment Report, July 2020 (ED121A-C/EB1420A-C)
- H. Revised Appendix 2 to the Epping Forest District Council Open Space Strategy (EB703), July 2021 (ED125/EB703A)
- I. IDP: Part B Infrastructure Delivery Schedule 2020 Update (ED117/EB1118)
- J. EFDC Consolidated and Updated Viability Evidence 2020 (ED116/ EB1117) Consolidated
- K. Statement of Common Ground Addendum East of Harlow, September 2020 (ED122A-B)
- L. South Epping Masterplan Area Capacity Analysis (Sites EPP.R1 and EPP.R2), March 2020 (ED120/ EB1421)
- M. In addition to the above there are a number of Examination Documents, which include Homework Notes produced by the Council as a result of actions identified by the Inspector at the hearing sessions as well correspondence between the Council and the Inspector following hearings. These Examination Documents can all be accessed on the [Local Plan website](#).

Please only attach documents essential to support your representation. You do not need to attach representations you have made at previous stages.

Part A – Your Details

1. Are you making this representation as? (Please tick as appropriate)

- a) Resident or Member of the General Public or
- b) Statutory Consultee, Local Authority or Town and Parish Council or
- c) Landowner or
- d) Agent

Other organisation (please specify)

2. Personal Details

3. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Mark"/>
Last Name	<input type="text"/>	<input type="text" value="Owen"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Associate Planner"/>
Organisation (where relevant)	<input type="text" value="Higgins Homes"/>	<input type="text" value="Barton Willmore LLP"/>
Address Line 1	<input type="text"/>	<input type="text" value="██████████"/>
Line 2	<input type="text"/>	<input type="text" value="██████████"/>
Line 3	<input type="text"/>	<input type="text" value="██████████"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="██████████"/>
Telephone Number	<input type="text"/>	<input type="text" value="██████████"/>
E-mail Address	<input type="text"/>	<input type="text" value="██"/>

Part B – Your representation on the Main Modifications and/or supporting documents

If you wish to make more than one representation, please complete a separate [Part B form](#) for each representation

4. Which **Main Modification number and/or supporting document** does your representation relate to? (Each Main Modification within the Schedule has a reference number. This can be found in the first column i.e. MM1, MM2 and each Supporting Document has a reference number beginning with ED).

Any representation on a supporting document should clearly state (in question 6) which paragraphs of the document it relates to and, as far as possible, your comments should be linked to specific Main Modifications. You should avoid lengthy comments on the supporting documents themselves.

MM no.

Supporting document reference

5. Do you consider this **Main Modification and/or supporting document**:
(Please refer to the Guidance notes for an explanation of terms)

- a) Is Legally compliant Yes No
- b) Sound Yes No

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

Positively prepared Effective

Justified Consistent with national policy

6. Please give details of why you consider the **Main Modification and/or supporting document** is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.

As indicated by MM88, the provision of housing at Chigwell has reduced from 376 to 206 dwellings within the Local Plan. This reduction in the number of dwellings is partly due to the removal of three previously allocated sites which have now been built out. In addition, following concerns raised by the Inspector, the Council have made the decision to remove a further two allocated sites at Chigwell ((The Limes Estate and Land at Chigwell Covent) from the Plan, which would have provided approximately 128 dwellings.

We note that Table 5.1 ('Settlements in Epping Forest District') of the Local Plan, which is based upon the conclusions of the Settlement Hierarchy Technical Paper (2015), identifies the settlement of Chigwell as a 'Large Village' which is the next settlement category down from a 'Town'. This is borne out by the number and range of facilities in the centre of Chigwell which serve the existing population and could serve an increase in the number of residents residing in the village. This marks Chigwell as being a location appropriate for growth within Epping Forest District.

We are aware, in consideration of concerns raised by the Inspector, that additional work to consider the impact of development on the Epping Forest Special Area of Conservation (SAC) has been undertaken and that the Council have concluded that taking account of amendments to or deletions of site allocations contained within the Local Plan, they are able to meet its housing requirement without the need to allocate additional sites and/or implement an amended spatial strategy which will mitigate any adverse effects on the integrity of Epping Forest SAC.

However, the Council are currently experiencing poor delivery rates which are largely due to the moratorium on development while the Council have been undertaking the additional work to consider the impact of development on the Epping Forest SAC to inform the Local Plan. Therefore, although the Council consider they are able to meet its housing requirement while also mitigating any adverse effects on the integrity of Epping Forest SAC, we do consider that further small/medium sites should be included within the Local Plan to boost its housing need, with such sites providing appropriate mitigation measures to avoid any impact on the SAC where required. Alternatively, if the current Local Plan is adopted, then we consider that an instant review of the Plan is undertaken to allocate further sites to improve the Council's housing supply position.

To support the spatial strategy for the District, we consider that new sites should be identified at Chigwell, to, at the very least, replace the two allocated sites which have been removed following the Inspector's comments which, as indicated above, would have provided approximately 128 dwellings. By not including new sites at Chigwell, we question whether the spatial distribution of housing towards this Large Village is justified and therefore sound.

We consider that there are sufficient, suitable and deliverable land around the edge of to be able to accommodate further sustainable growth of the village. Our client's site of Land at Luxborough Lane (Ref: SR-0108 within the Site Selection Report (2016)) which could provide circa 75 dwellings, is an example of such a suitable site, located in close proximity to the centre of Chigwell (which possesses a range of facilities and services as indicated above), the Underground Station, schools and areas for recreation and leisure. This Site is also located in close proximity to a bus route which runs along the High Road. Indeed, as is acknowledged within Site Selection Report (ARUP 2016), the site is free from national and regional ecological constraints, is not located within a Conservation Area and is not within the setting of any listed buildings. Furthermore, this Site would not prejudice the purposes of including land in the Green Belt because:

- (i) The land is well contained by housing and transport networks and thus would not be considered 'unrestrictive sprawl' of a built up area.
- (ii) Due to the site being visually contained, it would not result in the merging of towns and villages into one another.
- (iii) The land is not in countryside use and due to the surrounding character of the area would not be considered as having a rural nature.
- (iv) The town of Chigwell and its neighbours at Loughton and Buckhurst Hill are not historic towns.
- (v) There is a need for housing on greenfield land in the district and around Chigwell to meet long-term growth requirement because there is not sufficient sites being put forward which would involve the recycling derelict and other urban land.

We therefore consider that our client's site would assist in replacing those allocations removed from the Plan at Chigwell, and therefore support growth towards this Large Village which in turn will help boost the Council's housing supply position.

7. Please set out what change(s) you consider necessary to make the **Main Modification and/or supporting document** 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 Submission Version of 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.

As explained above, we consider that new sites should be identified at Chigwell, to, at the very least, replace the two allocated sites (The Limes Estate and Land at Chigwell Covent) which have been removed following the Inspector's comments which, would have provided approximately 128 dwellings. By not including new sites at Chigwell, we question whether the spatial distribution of housing towards this Large Village is justified and therefore sound.

As indicated above, we consider our clients site of Land at Luxborough Lane could be included as a new allocation within the Local Plan, to support growth towards Chigwell as a sustainable Large Village, and in turn boost the Council's housing supply position.

8. Have you attached any documents with this representation which specifically relate to an MM or supporting document?

Yes

No

Signature:



Date

22/09/2021