

Representation form for Submission Version of the Epping Forest District Local Plan 2011-2033 (Regulation 19 publication)

This form should be used to make representations on the Submission Version of the Epping Forest District Local Plan which has been published. Please complete and return by 29 January 2018 at 5pm. An electronic version of the form is available at <http://www.efdclocalplan.org/>

Please refer to the guidance notes available before completing this form.

Please return any representations to: Planning Policy, Epping Forest District Council, Civic Offices, 323 High Street, Epping, Essex, CM16 4BZ

Or email them to: LDFconsult@eppingforestdc.gov.uk

BY 5pm on 29 January 2018

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Please attach any documents you wish to submit with your representation

Part A

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" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Charlotte"/>	<input type="text"/>
Last Name	<input type="text" value="Tolfree"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text" value=".....Redacted....."/>	<input type="text"/>
Line 2	<input type="text" value=".....Redacted....."/>	<input type="text"/>
Line 3	<input type="text" value=".....Redacted....."/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value=".....Redacted....."/>	<input type="text"/>
Telephone Number	<input type="text" value=".....Redacted....."/>	<input type="text"/>
E-mail Address	<input type="text" value=".....Redacted....."/>	<input type="text"/>

Part B – If necessary please complete a separate Part B form for each representation

4. To which part of the Submission Version of the Local Plan does this representation relate?
(Please specify where appropriate)

Paragraph Policy Policies Map

Site Reference Settlement

5. Do you consider this part of the Submission Version of the Local Plan:

*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

c) Complies with the duty to co-operate Yes No

6. Please give details 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. 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

Failure to Meet National Planning Policy Framework (NPPF) Soundness Test of Being Positively Prepared and Accommodating Future Housing Need

For a Local Plan to meet the soundness test of being positively prepared the plan must be based on a strategy that meets objectively assessed development and housing need.

However, the evidence suggests that the target in the EFDC Local Plan to build 518 units per annum is significantly below what is needed to fulfil this test and that the target should be raised.

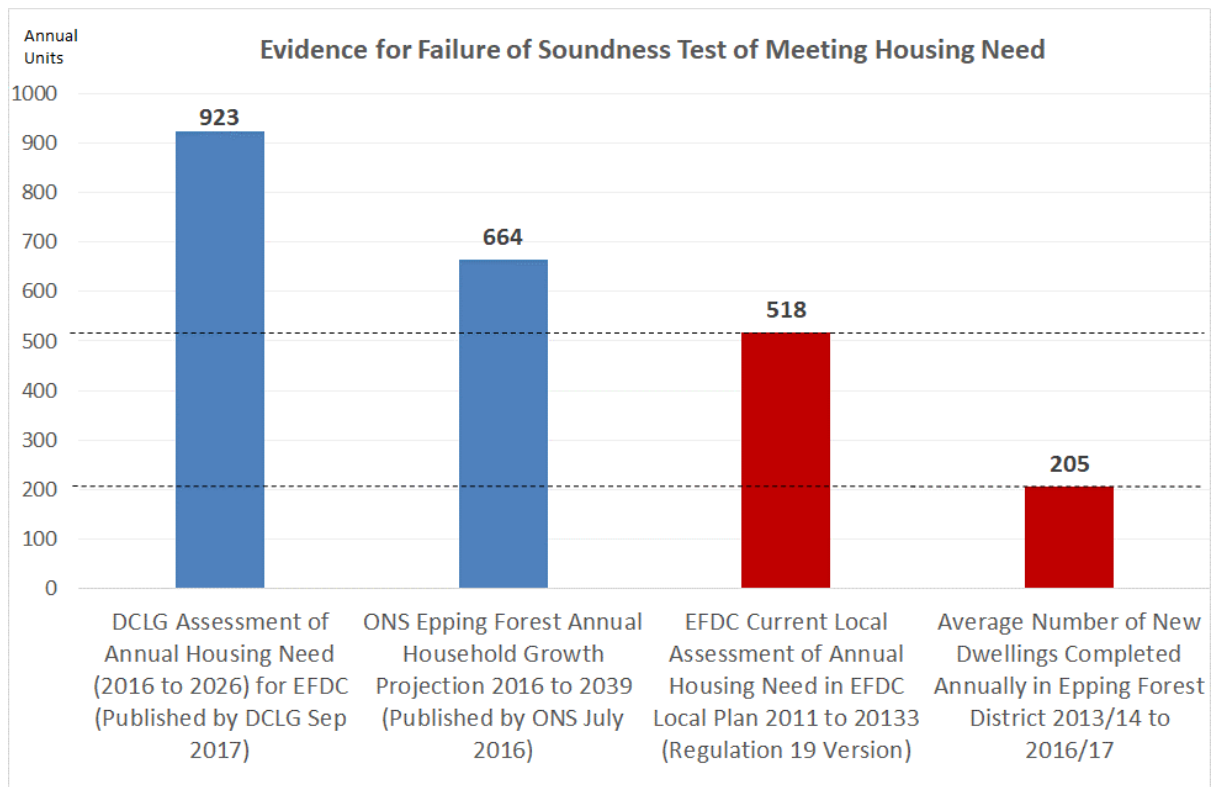
For example, in September 2017 the government consulted on measures set out in the 2017 Housing White Paper to increase housing supply. This proposes to reform the planning system to increase the supply of new homes and increase local authority capacity to manage growth.

The proposals include a standard method for calculating local authorities' housing need and sets out a housing need figure for every local planning authority. The assessment provided by DCLG calculates Epping Forest District must deliver 923 dwellings per annum to meet its housing need (versus the current Local Plan assessment of 518 units).

Moreover, as the below chart shows, recent levels of completions in the district have averaged 205 units per annum, less than a third of what the government calculates is needed.

Even if one simply looks at the future household growth requirements for Epping Forest District, as contained in the latest ONS sub-national household projections, the target of 518 units falls short of the 664 households the ONS calculate Epping Forest will need to accommodate each year.

Figure 1: EFDC Local Plan Targets vs Government Assessment of Needs



Failure to Meet National Policy Soundness Test to Identify and Maintain a Rolling Supply of Deliverable Sites

Para 47 of the NPPF states Local Plans must provide a supply of sites sufficient to provide five years' worth of housing against their housing requirements – which should include an additional 5% or 20% buffer to ensure choice and competition. Para 47 states that the 20% buffer “applies where there has been persistent under delivery of housing”.

Figure 1 above shows EFDC’s persistent under delivery of housing in recent years (205 units per annum). Yet despite this there is no evidence of the buffer expected by the NPPF of 5% to 20% (arguably 20% given recent rates of delivery) in EFDC’s 5 year land supply.

Failure to Allocate Appropriate Sites Consistently with National Policy

Para 83 of the NPPF states that local planning authorities with Green Belt in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy.

Green Belt amendments proposed in the EFDC Local Plan will, however, result in inappropriate development and settlement activity in the village of Stapleford Abbots.

3. Concentrate almost all new housing development in Stapleford Abbotts in one location. This is also an entirely new allocation and Green Belt alteration, not consulted upon or included in the October 2016 version of the Epping Forest Local Plan, as shown in Figures 2 and 3 below.

Figure 3: Allocations October 2016 Local Plan



The Local Plan should be read as a whole. Proposals will be judged against all relevant policies.

7. Please set out what change(s) you consider necessary to make the Submission Version of the 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 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.

To make the Submission Version of the EFDC Local Plan consistent with National Policy, and compliant with the test of being positively prepared, an increase in housing numbers and a further call for sites exercise, which allows new Green Belt amendments, should take place immediately.

This would be in keeping with **National Policy**.

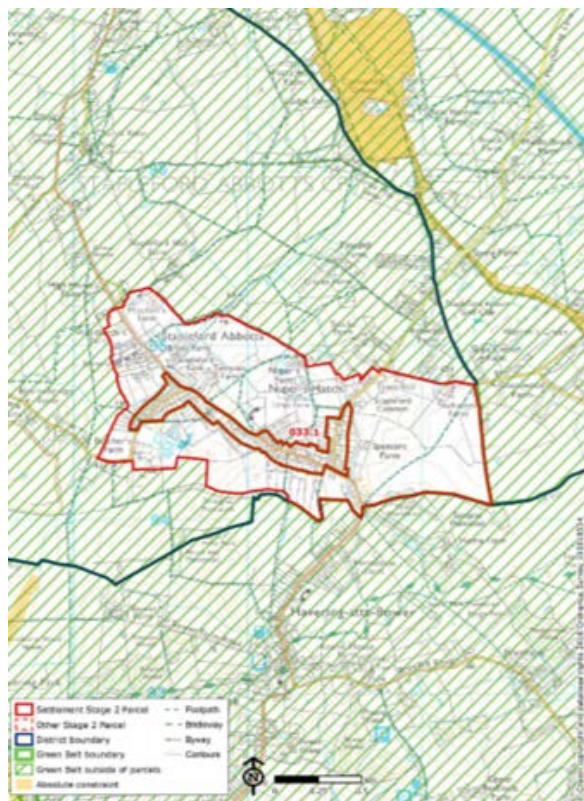
The 2017 Housing White Paper, for example, states that the current national housing crisis exists not because there is no space, or because the country is “full”. Only around 11% of land in England has been built on. The problem is identified as threefold: not enough local authorities planning for the homes they need; house building that is simply too slow; and a construction industry that is too reliant on a small number of big players. The White Paper states that authorities can amend Green Belt boundaries when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements.

DCLG data show that Epping Forest District has the highest proportion of land area covered by Green Belt and Special Designations (94%) of any Local Authority in the country. Without releasing more Green Belt land for development it is clear Epping Forest District will not be able to meet its designated levels of housing need.

At a settlement level, as noted in section 6, sites currently identified in Stapleford Abbotts by the Local Plan are not the most appropriate for new development. New sites suitable for release should be identified immediately.

The start point for this should be the Epping Forest Green Belt Assessment, prepared for EFDC by Land Use Consultants in 2016, which assesses the whole land parcel bordering Stapleford Abbotts. It finds that the Green Belt in this area plays a moderate role in checking unrestricted sprawl of built up areas and a strong role in safeguarding the countryside from encroachment. The next stage should be to look at individual sites within this bigger parcel (shown in Figure 4 below) to identify specific Green Belt amendments where new site allocations could be made. The proposed allocation of site STAP.R1 within the area assessed in the 2016 Green Belt Assessment establishes the principle of allocation sites within this assessment area.

Figure 4: LUC Green Belt Assessment for EFDC Stage 2 Review Area



We would like to put forward the 2.75 hectare site to the West of Bournebridge Lane (shown in Figure 5 below,Redacted.....
.....Redacted.....) to be considered for a new housing allocation.

Figure 5: Land to the West of Bournebridge Lane



The site plays a very limited role in meeting the purposes of the Green Belt set out in the NPPF as follows:

Purpose 1 – Check the unrestricted sprawl of large built up areas – the site is not physically or perceptually connected to a large built up area so does not play a role in purpose 1. The site's Green Belt designation does not prevent the spread of a large built up area.

Purpose 2 – Prevent neighbouring towns from merging – the site is not part of a gap between settlements so plays no contribution to this purpose.

Purpose 3 – Assist in safeguarding encroachment to the countryside – the site is relatively enclosed being surrounded by trees on three sides and the road on the fourth side. These reduce links to the surrounding countryside and mean that the site is not open in character. There are visual links to the neighbouring residential developments to the north, east and south, giving it a semi urban feel.

An aerial picture of the site illustrating this is shown in Figure 5.

Purpose 4 – To preserve the special character of historic towns – there are no historic towns within or adjacent to the parcel.

The site is not in a conservation area, suffers no flood risks, has direct proximity to services and has excellent road access.

The current designation of the site is agricultural land and, whilst the site lies within the Green Belt, it adjoins the boundary of the Green Belt and the designated settlement boundary of Stapleford Abbots, as shown in Figure 6 below.

Figure 6: Land to the West of Bournebridge Lane – Relationship to Green Belt



Developing the site could be therefore be achieved with a minor adjustment to the existing Green Belt boundary, helping spread housing across more of a range and mix of sites, as promoted in the NPPF, rather than concentrating new housing almost exclusively in one place in Stapleford Abbots.

Accordingly, we recommend that Local Plan Policy P12 be amended to allow for a new allocation of housing on the West of Bournebridge Lane site.

(Continue on a separate sheet if necessary)

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

☒ X

No, I do not wish to participate at the hearings

☐

Yes, I wish to participate at the hearings

9. If you wish to participate at the hearings, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

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

☒ Yes ☐ No

11. Have you attached any documents with this representation?

☐ Yes ☒ No

Signature:

C. Tolfree

Date:

28/01/2018
