

Epping Forest District Council Representations to the Draft Local Plan Consultation 2016 (Regulation 18)

Stakeholder ID	3521	Name	Rebecca	Booth	Leith Planning Limited
Method	Letter				
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Letter or Email Response:

Dear Sir/Madam, Re: Epping Forest Local Plan - Consultation Draft Executive Summary In commenting on the draft Local Plan, we would ask that the Council give further thought to the needs of an ageing population. This should include the provision of site specific allocations for care and accommodation for this growing sector of the community. As part of this submission we would draw attention to the health club on Abridge Road, Chigwell which is now being operated by Nuffield Health. It is proposed that the entire site be allocated as an Extra Care Village for older persons (ideally within the provisions of Class C2) with strong linkages to the existing health club. The development would seek to focus on the health, well-being and fitness of the community. Public consultation It is understood that Epping Forest District Council are undertaking a public consultation on the draft Local Plan. It is noted that the Council are seeking feedback from all interested parties on the draft policies and proposed allocations set out within the document, with all representations being taken into account in the preparation of the Pre- Submission Publication draft document (which is currently expected to be published in June/July 2017). The consultation draft report states as follows: "1.1 The Epping Forest District Draft Local Plan sets out the proposed strategy for meeting the District's needs for the next 17 years. It is not a final Plan but represents the Council's preferred approach based on the evidence currently available and the results of the previous consultations in 2010/11 and community choices in 2012. It is published to gather the views of residents, businesses and others with an interest in the area and is accompanied by a questionnaire for completion." "1.4 This Draft Local Plan includes the draft policies that the Council considers to be the most suitable way to develop the District in the future and explains other options it has considered and decided not to take forward together with the reasons for those decisions." It is noted that the Council are also undertaking a Call for Sites exercise as part of the current consultation. It is understood that the consultation closes on Monday 12th December. Instructions Leith Planning Ltd act on behalf of Stenprop Ltd, who manage land at Abridge Road, Chigwell on behalf of Chigwell Properties Ltd. The site is delineated on the plan included at Appendix 1. We are instructed to review the content of the draft Local Plan and to make representations as necessary. Content of Draft Local Plan Population Change It is noted that the consultation draft Local Plan makes reference to the fact that the population of Epping Forest is ageing and attention is drawn to the following extracts of the document: "2.5 In 2011, compared to the rest of England, the District had smaller proportions of people aged under 30 and a larger proportion of people aged 45 to 64, and 65 and over. Figure 2.3 shows the breakdown." "2.6 By 2033, projections suggest the proportion of people aged over 65 will rise sharply compared to the other age bands, and that there will be a significant drop in the proportion of people aged between 30 and 64. Projections also suggest that the proportion of those between 15 and 29 will drop slightly, and that the proportion of people aged 0 to 14 will rise a little. Figure 2.4 shows the breakdown for

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Epping Forest District in 2011 and the projected breakdown in 2033.” It is noted that the population of Epping Forest have a higher than average life expectancy at age 65. The document details that: “2.10 Life expectancy at age 65 in Epping Forest District in 2010-12 was higher than the national and Essex averages, and similar to that of the East of England, as shown in Figure 2.7. Life expectancy at age 65 in the District has also risen overall since 2000.” The acknowledgement of the Council to the fact that there is an ageing population within Epping Forest is welcomed and wholly supported. However, it is considered that this is not sufficiently identified within the key issues section of the document which makes only limited reference to this important matter as follows: “• the need to ensure a housing stock that matches the needs of the population, including catering for an ageing population and more single person households than we have seen before, providing affordable housing and starter homes for those who cannot afford market prices and assessing the needs of, and providing for the Traveller and Travelling Showpeople communities;” Meeting the challenges of an ageing population should be seen as an issue in its own right, as it covers more matters than simply that of housing. Care, support and independence are vital in meeting the needs of this growing sector of the community, and therefore provision of suitable facilities and homes for older people should be being addressed as an issue in its own right. Failure to appropriately meet the growing needs of an ageing population will result in an unsound plan which is not fit for purpose and which will fail to meet the needs of the community by 2033. It is noted that the Council propose to address the housing needs of an ageing population within draft Policy H1, which reads as follows: “Draft Policy H 1 Housing Mix and Accommodation Types ...” Whilst we welcome the efforts of the Council to address the housing needs of older people within the draft Local Plan, it is our view that such is the need for this part of the population, that the matter should be addressed by way of a specific policy, in much the same way as draft Policy H3 which permits rural exceptions for affordable housing in smaller settlements. Further clarification should also be provided within the plan as to what the housing need is for older persons and the forms of accommodation which are required and desired. The provisions of draft Policy H1 would appear unduly prescriptive and could well inhibit the delivery of much needed purpose built accommodation for those in need of specialist accommodation. Certain sites outside of defined settlements such as the site at Abridge Road, can offer a development which is well located and connected by public transport to the settlements of Chigwell and Loughton, but in a quiet and tranquil setting with supportive neighbours, friends and care workers on hand to promote independence and a lack of isolation. It should be noted that meeting the housing and care needs of an ageing population is not ‘one size fits all’ matter, and will cover the spectrum of both Use Class C2 (such as that being proposed at Abridge Road) and Use Class C3. The issue therefore needs to be addressed in detail and flexible housing options presented to meet the spectrum of need within this growing portion of the population. Distribution of Development In relation to the spatial distribution of growth it is noted that the Council are proposing the provision of just 430 units within Chigwell and 1,190 units within Loughton over the life of the Plan (see Draft Policy SP 2: Spatial Development Strategy 2011-2033). Furthermore, the policy framework does not appear to allow any flexibility in the level of provision nor in the provision of any development outside of defined settlement boundaries (other than that permitted under draft policy H3). This lack of flexibility could well inhibit the Council’s ability to deliver the much needed new homes across the District for a variety of identified needs. We would therefore suggest that the Council reconsider this approach and make clear that the housing figures are not fixed, and that the provision of approximately 11,400 units (and by settlement breakdown) over the life of the plan are not ceiling figures. Given that the National Planning Policy Framework and the Government are clear in their requirement to deliver much more housing, any intimation within the Plan of a lack of flexibility would appear to be contrary to national policy. Securing a flexible approach to housing delivery will assist the Council in meeting the housing needs of the District up to 2033, and will make allowances should some of the proposed allocations fail to be delivered in full, or at all. Green Belt In relation to development within the Green Belt it is noted that Draft Policy SP5 reads as follows: “Draft Policy SP 5 Green Belt and District Open Land Green Belt ...” It is noted from Figure 3.8 that the Council are proposing very limited release of Green Belt to the south and east of the District, with no changes to the boundary being proposed around the key settlement of Loughton. It is our view that the release of Green Belt land has been unfairly weighted to the north and west of the District to facilitate the growth of Harlow. Whilst it is accepted that there is a need to co-operate with neighbouring authorities, and that Harlow is a focus for housing and jobs growth, the approach currently being proposed would appear to be restricting housing delivery elsewhere within the District, and will result in raised levels of commuting which can only be seen as unsound and unsustainable. We would therefore wish the Council to reconsider the provision of some further limited release of Green Belt around some of the key settlements in the south and east of the District, including Loughton and Chigwell, to ensure a more balanced approach to growth. Whilst it is noted that development to the south of Loughton has been

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discounted on the grounds of incompatibility with existing commercial uses and a high flood risk, some sites within this area, including the land delineated at Appendix 1 can serve to not only enhance the flexibility of the plan, but can also be developed to protect the openness of the wider Green Belt and can deliver additional community gains. Given that the site is already fairly developed, the provision of an allocation at this site is not deemed to have any greater detrimental impacts on the Green Belt than the current situation. Furthermore, the provision of a site specific allocation at this location will not result in the coalescence of Chigwell and Loughton. Leisure The site at Abridge Road, which is delineated at Appendix 1 of this submission, currently includes provision of leisure and recreation uses. The site owners are keen to retain this existing use and recognise the benefits of draft Policy E4 which reads as follows: "Draft Policy E 4 The Visitor Economy..." We would however ask that the Council consider the provision of a site specific policy for the land at Abridge road which facilitates its growth and investment, and includes provision for additional development on site to secure the long term viability of the facility. Site Submission As detailed above we consider that the land at Abridge Road, whilst being currently located within the Green Belt, with a well thought out proposal could well offer the local community a valuable community asset. We would therefore wish to work with the Council to identify a suitable site allocation within the emerging Local Plan which seeks to maintain the existing use on the site, but also seeks to facilitate other forms of development, particularly on the land facing Abridge Road which can offer some much needed additional housing/care facilities and potentially other community uses. Whilst our clients would be willing to consider alternative uses, in the first instance we would be proposing an Extra Care Village for older persons (ideally within the provisions of Class C2) with strong linkages to the existing health club. The health club is now being run by Nuffield Health which in itself offers opportunities to improve the site to create a suitable Care Village for older persons with significant focus on health, well-being and fitness. Any proposed development could potentially include the provision of additional leisure/recreation space on site to support the Extra Care use (albeit available to the wider community). This form of development could well assist in reducing the current under- provision of elderly care within the district, generate opportunities for employment and enhance the sustainability of this part of Chigwell, with a development designed such that it does not undermine the openness of the Green Belt. Such a scheme could still include ancillary recreational uses such as that shown on the plan included at Appendix 2 and could be supported with a site specific bus service or a contribution to the local bus service being promoted within the Chigwell Neighbourhood Plan. We have therefore completed the relevant Call for Sites form such that the site can be assessed for a potential site allocation. Chigwell Neighbourhood Plan Having reviewed and commented on the draft Chigwell Neighbourhood Plan it is noted that the document stated as a follows in relation to the compatibility of the Neighbourhood Plan with the Epping Forest Local Plan: "3.7 Unfortunately, despite the efforts of the Parish Council, it has not yet been possible to agree a consistent approach to the spatial strategy for allocating housing land in the Parish. In which case, the Parish Council has chosen to consult the local community and other stakeholders on its preferred strategy in this document and accept that the District Council will very shortly consult the community on a strategy with some significant differences. 3.8 Essentially, the District Council strategy is focused on avoiding releasing land from the Green Belt as far as possible, by identifying open space at Limes Farm for more than half the 400 new homes required of the Parish to 2031. It is also proposing the development on the open land that forms the setting to the listed Chigwell Convent (the former Chigwell Manor House of the 18th Century). This presents a very different strategy to those identified and assessed in its earlier work of 2012, which looked at options for major Green Belt land releases around Chigwell Village. 3.9 Conversely, the Parish Council has always been clear that Chigwell does not possess sufficient residential or commercial land, with which to satisfy the assessed requirement for housing within the Parish, without looking for land in the Green Belt. As a result a policy based on land prioritisation has been developed. This policy creates a priority listing so as to ascertain sites within the Green Belt which are capable of development through either a change in classification or the provision of very special circumstances." Whilst we have made representations to the draft Chigwell Neighbourhood Plan which are also supporting the merits of allocating the land at Abridge Road (see Appendix 3), we support the Parish council in their overall conclusion regarding the need for additional housing and employment land within the settlement and the need for release of further Green Belt land. We would welcome the opportunity to meet with the Council in due course to update it on activities on the site and the proposals detailed above in advance of preparation of the next stage of the Local Plan. Yours faithfullyRedacted.... Managing Director Enc *Attachments -Call for site form & Appendix 1,2 & 3* homes

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