

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

RODING VILLAGE-CHIGWELL

NEW GARDEN VILLAGE



In respect of:

Roding Village, Chigwell

On behalf of:

Bullwood Limited

January 2018

Introduction

This representation to the Submission Draft Local Plan is submitted on behalf of Bullwood Limited, the promoters of the Roding Village, Chigwell, hereafter referred to as the “Roding New Garden Village”.

The representation follows submissions made at the Regulation 18 stage and demonstrates that the Roding Garden Village proposals represents the most appropriate strategy within the Draft Local Plan.

ILLUSTRATIVE MASTERPLAN



NEW HOMES

200+ starter homes aimed at assisting first time buyers and key workers.

400+ homes meeting general needs housing within the District.

Retirement village including care home and dementia facilities catering for a under provided group within the District. This would also free up larger family homes within the District.



COMMUNITY FACILITIES

Schools, a community hall and shops alongside existing recreation uses.



LEISURE/OPEN SPACES

A country park; existing golf driving range & high quality gymnasium with indoor & outdoor pools.



INFRASTRUCTURE

Transport and train links to London via the M11 and Debden tube station.



EMPLOYMENT

200+ jobs would be provided through the care village as well as the new community facilities and shops.



HEALTH

Doctors surgery and private hospital.

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; 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.

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.

The Roding Garden Village proposal is to create a new garden village complete with its own new infrastructure comprising a mix of starter homes, market and retirement homes, school, community facilities including Doctor Surgery and Private Hospital and other employment uses within a single allocation, in the control of one landowner and in a sustainable location that is within walking distance of Debden tube station. This proposal presents an opportunity to relieve the pressure that is being placed on the villages such as Theydon Bois, Chigwell and Loughton through the current draft Local Plan.

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. The Roding Garden Village is an example of a site that is currently omitted from the Plan, which could be allocated to meet this need.

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

We support Epping Forest District Council's acknowledgment that "exceptional circumstances" exist to justify the release of land from the Green Belt in order to meet its OAN. The next step is to select the most suitable and sustainable sites in the most suitable locations.

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.

Notwithstanding, in accordance with the following order of priority stated in the Submission Local Plan sequential approach we have assessed our site as follows:

- 1. A sequential flood risk assessment – proposing land in Flood Zone 2 and 3 only where need cannot be met in Flood Zone 1.*

The land proposed for housing development at Roding Garden Village is entirely located within Flood Zone 1 with strategic open space and country park located within Flood Zones 2 and 3.

- 2. Sites located on previously developed land within settlements*

The Roding Garden Village is presently used as a golf course with a number of existing buildings and part of a wider developed leisure complex including the top golf, gym, restaurant and hotel.

Paragraph 17 of NPPF sets out 12 core principles of sustainable development, including the use of previously developed land and the allocation of land for development which has “lesser environmental value”, the latter being repeated at paragraph 110 of NPPF. This supports development on this site, which is currently used as a golf course and is not high quality agricultural land.

- 3. Sites located on open space within settlements where such selection would maintain adequate open space provision within the settlement.*

The land is a privately owned member’s golf course and would not create a deficiency of golf courses within the District. The proposals include retention of a substantial element of strategic open space and a Country Park is proposed within the development which will be new publicly accessible open space to offset any loss elsewhere in the Borough.

- 4. Previously developed land within the Green Belt (in anticipation of the NPPF being updated to take account of the proposed changes published in December 2015).*

The site is currently used as a golf course and is leisure. It should therefore be a preferred location for new residential development rather than the high quality agricultural land, in open countryside and on higher quality Green Belt land.

- 5. Greenfield/Green Belt land on the edge of settlements: Of least value to the Green Belt if the land meets other suitable criteria for development.*

The land proposed for development is on the immediate edge of the existing settlement of Debden and has a low or medium value in terms of Green Belt quality given its current use.

- 6. Agricultural land*

The sequential approach to the release of potential sites for housing development is quite clear that agricultural land, particularly high quality agricultural land, is the most significant test to be applied. The site is non-agricultural land with no prospect of reinstating any agricultural use for practical and economic reasons. As such the site should be allocated before any high quality agricultural land.

- 7. Enable small scale sites in smaller rural communities to come forward where there is a clear local need which supports the social and economic well-being of that community.*

This is not considered a sustainable and suitable approach and would conflict with the findings of the Council's SA.

Therefore, in accordance with the draft Local Plan the land should be allocated for housing above many of the selected options in accordance with the Council's own policy in the draft Local Plan.

We are also concerned that Policy SP2 proposes allocations for up to 175 dwellings in "small villages" which are locations that conflict with the "Core Principles" of the NPPF. These villages include: Coopersale, Fyfield, High Ongar, Lower Sheering, Roydon and Stabbleford Abbots. These locations are not sustainable locations for development of this scale and their identification is inconsistent with the Sustainability Appraisal.

We are promoting an alternative option to the current strategy and are seeking to deliver a new garden village between Loughton and Chigwell as illustrated by the Masterplan below.

ILLUSTRATIVE MASTERPLAN



<p> NEW HOMES 200+ starter homes aimed at assisting first time buyers and key workers.</p> <p>400+ homes meeting general needs housing within the District.</p> <p>Retirement village including care home and dementia facilities catering for a under provided group within the District. This would also free up larger family homes within the District.</p>	<p> COMMUNITY FACILITIES Schools, a community hall and shops alongside existing recreation uses.</p> <p> LEISURE/OPEN SPACES A country park; existing golf driving range & high quality gymnasium with indoor & outdoor pools.</p> <p> INFRASTRUCTURE Transport and train links to London via the M11 and Debden tube station.</p>	<p> EMPLOYMENT 200+ jobs would be provided through the care village as well as the new community facilities and shops.</p> <p> HEALTH Doctors surgery and private hospital.</p>
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We are concerned that the current allocations within the Submission Local Plan are focused 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.

Our proposals are an alternative to the proposals within the Submission Local Plan and propose to create a new garden village complete with its own new infrastructure. The Roding New Garden Village is a self-sustaining new village proposal which will be built entirely on golf course land currently in use for leisure and commercial uses. The proposal will not result in the loss of high quality agricultural land and will protect important open spaces within the urban area from coming under pressure for development.

The Roding New Garden Village proposals which will deliver as follows:

New Homes

- 200+ starter homes aimed at assisting first time buyers and key workers.
- 400+ homes meeting general needs housing within the District.
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Infrastructure

- Schools;
- a community hall;
- shops alongside existing recreation uses;
- Doctors Surgery;
- Private Hospital; and
- Improved transport links.

Employment

- 200+ jobs would be provided through the care village as well as the new community facilities and shops.

Question 7: Changes considered necessary

Policy SP2 is currently unsound as it is not justified, positively prepared or effective. This policy should include reference to the Roding New Garden Village proposals as an allocation for approximately 600 homes.

Policy P7 Chigwell

Question 6: Why the Submission Local Plan is unsound

This policy should be amended to include land at Roding New Garden Village.

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Employment

- 200+ jobs would be provided through the care village as well as the new community facilities and shops.

Question 7: Changes considered necessary

Policy P7 is currently unsound as it is not justified, positively prepared or effective. This policy should include reference to the Roding New Garden Village proposals as an allocation for approximately 600 homes.

Summary

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:

- the plan is not positively prepared because the plan fails to meet objectively assessed housing needs for the area;
- the plan is not justified because it does not represent the most appropriate strategy, when considered against the reasonable alternatives;
- the plan is ineffective because it does not give confidence that the right amount of development is deliverable over the plan period; and
- 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.

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We do not therefore support the current strategy within the Local Plan for the foregoing reasons. It is our submission that the inclusion the Roding Garden Village site as illustrated by the enclosed brochure will make the Local Plan “sound” and address the shortfalls within this Local Plan identified above.