



Strategic Planning & Research Unit

For and on behalf of  
**Peer Group Plc**

**Epping Forest Local Plan Examination  
Response to MIQ's Matter 2: Context, Vision & Objectives  
And Sustainable Development**

**The Ongar Park Estate  
North Weald Bassett**

Prepared by  
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## MATTER 2: CONTEXT, VISION & OBJECTIVES AND SUSTAINABLE DEVELOPMENT

### Issue 1: Are the Context, Vision and Objectives for the Plan accurate and comprehensive?

- 1.1 The statement in Vision for the District A (ii) (page 19 of the submission Local Plan) is misleading. The level of new homes will not meet local needs. This is recognised by the Plan itself in Paragraphs 2.43 and 2.44 page 24 which highlight even on the Council's own evidence the Plan underprovided by 1,173 dwellings.
- 1.2 More importantly the Foreword to the submission Local Plan by Councillors Whitbread and Phillip, explicitly stated that the reason for the timing of the Submission Local Plan: "would expose us all to the risk of the housing requirement rising from 11,400 to over 20,000 homes by 2033". This is not a positive, justified or effective approach to the Plan's preparation or submission, and it is most certainly not consistent with national policy, particularly where the Council's evidence base was incomplete, and the Council had to cut corners in order to meet the submission deadline.
- 1.3 It is this higher target of 20,000 that is supported by Government in their recent announcements (The Technical Consultation December 2018) and is required to be provided if the Government's target of 300,000 dpa is to be achieved.
- 1.4 By misleading the public, the Plan undermines the planning process and brings those engaged in it into disrepute. A suggested amendment to A (ii) (page 19 of the submission Local Plan) would be as follows:
 

*"A. By 2033 Epping Forest District will be a place where:  
 (ii) new homes of ~~an appropriate~~ a mix of sizes, types and tenures to meet some of the local needs have been provided however the level of provision will fall well short of the 20,000 dwellings that the underlie the governments stated objective of achieving 300,000 dpa and as such will continue to add to the housing crises meaning that many of the younger population in the district will be unable to access housing and this will cause a delay in household migration as well as increased outmigration of population as they seek to meet their housing needs elsewhere. It is recognised that this will cause both environmental and social damage as it is likely to increase travel distances, increase the number of shared households, increase intergeneration inequality and as such will lead to a less diverse and less well integrated communities created;"*
- 1.5 The Local Plan Objectives more accurately reflect the position that the objective need is not being met (part B(i)) page 20) but part (iii) does not acknowledge the consequence of not meeting objectively assessed need.
- 1.6 SPRU have also identified (Regulation 19 objection and in more detail in their objection on 5 year land supply and full Plan delivery) that the Plan taken as a whole will not deliver the stated objectives in that the rates of the delivery and lead in times of the selected allocations are likely to result to both a shortfall in the five year land supply (which will be a material consider after the Plan has been adopted for a year) and a shortfall over the Plan period as a whole.
- 1.7 Again the requirement for flexibility in paragraph 14 (Framework 2012) has not been met.

1. **Does Figure 1.3 on page 7 accurately reflect the content of paragraph 1.36 in terms of the most common job types in the district? Figure 1.3 indicates that public administration, education and health industries employ the second largest number of people in the district, but this is not mentioned in paragraph 1.36.**
2. **Is Figure 1.5 on page 9 accurate in showing the period 2001- 2013 on the x-axis rather than the period 2011-2033?**
3. **Do the Vision and objectives adequately reflect the Plan's aims for air quality, green and blue infrastructure, protection of the landscape and biodiversity, and healthy living? Should specific reference be made to the aim of conserving or enhancing the historic environment, including archaeology?**
4. **Should the vision support the leisure and nature conservation aims of the Lee Valley regional park to fully reflect its statutory purpose? Does the supporting text in paragraphs 2.18 -2.24 adequately reflect the strategic aims of the Parks Authority's adopted vision? (Reps LVPR).**

**Issue 2: Is Policy SP1 Concerning the presumption in favour of sustainable development necessary and consistent with national policy?**

1. **Does policy SP1 add anything to, or seek to depart in any way, from national policy in Paragraphs 11-16 of the NPPF? If not, is this policy necessary? If it is necessary, is it consistent with national policy?**
- 2.1 The SPRU objection to Policy SP1 is that due to the lateness of the availability of the full evidence base (The Site Selection Report), the first statement in Part A of the Policy cannot be demonstrated.
  - 2.2 The Council has not taken a positive approach to the consideration of development proposals within the Plan itself. Plan preparation has purposefully excluded suitable sites which are known reasonable alternatives, it has failed to meet its identified need according to its own evidence base, and the Council has rushed the timing of the ill prepared submission to avoid having to plan for a level of housing that is required to meet the Government's stated policy objective of 300,000 dpa.
  - 2.3 Part 1 bullet point 2 of paragraph 14 Framework 2012 requires that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change and (paragraph 157) to take account of longer term requirements.
  - 2.4 In this case the Foreword to the Plan identifies clearly the level of housing required to meet the Government's objective as being 20,000 dwellings and yet there is nothing within the Plan, or this policy in particular, that provides any indication as to how the Council will respond to this challenge. The Plan is completely deficient and inflexible in this respect.
  - 2.5 The Plan has no policies providing an indication of how the Council will seek to meet its known higher requirement in the future, in fact there is no policy at all that addresses the issue of meeting additional housing demand. This is despite the evidence base highlighting that there are sites in areas of Green Belt assessed to cause no more harm than those sites which are identified for release. The release of sites in the Green Belt is not therefore rational, objective or consistent. Such sites should have been allocated or at least removed from the Green Belt as part of a rational consideration of exceptional circumstances and considered and accounted for in light of the requirements of Framework 2012, paragraph 14.
  - 2.6 As the Plan making process adopted by the Council does not reflect the requirements of

Framework 2012 paragraph 14 (or the subsequent policies) then the second part of paragraph 14 cannot be imported into SP1.

- 2.7 None of the Council's actions in the preparation of this Plan reflect the "golden thread" of sustainability running through **plan making and decision making** (Framework 2012 Paragraph 14). The Council's Plan preparation is not recognisable in terms of the approach to sustainable development, reflecting the presumption in favour of sustainable development, as contained in the National Planning Policy Framework or the overarching national requirement to boost significantly the supply of housing.

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