

INDEPENDENT EXAMINATION OF THE EPPING FOREST LOCAL PLAN 2011-2033

MATTER 15: Places: **Policy P7: Chigwell** Hearing Statement by: Freetown Homes Representor Number 19LAD0097

1.0 Background to the Representors Submissions

1.1 The Inspector will be aware that the Representor's position along with others is that *Chigwell* has been unnecessarily and unjustifiably neglected as a location for, amongst other things, the review and release of land from the Green Belt and for the allocation of strategic sites for housing in the Local Plan.

1.2 The Settlement's status and credential as a location for strategic development have been rehearsed in the submissions of several representors and at this Examination already. In summary, they are:

- It is one of the larger of the 'Large Villages' (and by almost any other objective definition, a 'town' – a designation avoided in the Local Plan probably for political reasons, because of the community's outdated and palpably inaccurate strident *self-identification* as a village);
- It is the closest settlement in Epping Forest District to Greater London, with which it is physically contiguous, to the extent that there is no clear physical and townscape demarcation between the respective built-up areas;
- It possesses excellent communications, with, amongst other things, two London Underground (Central Line) Stations, with spare capacity both at the stations and on the Central Line (where capacity will increase upon completion of the Elizabeth Line), and good access (by bus) to the new Elizabeth Line station at Ilford

- It has excellent range of commercial (retail), community, education and sport and recreation facilities. The latter will be enhanced significantly by the Parish Council's proposed new 'Community Hub' which, along with the Village centre and the Underground Station, immediately adjoins the Representor's Omission Site and facilities would be further improved by the Representor's own proposals for the Omission Site at Hainault Road, which includes a new Primary school, at least a *satellite* Primary Health Care facility and a Nursing/Care Home for the elderly.

It is unquestionably a highly sustainable place and an excellent location for strategic development allocations.

- 1.3 The Council has already acknowledged that it has **not** considered a locational strategy for development focussed upon the London Underground stations and other transport hubs in the District. In addition the Inspector has heard the concerted and consistent comments by a wide range of Representors – including Freetown Homes - that the Plan's spatial strategy, is at best, opaque, incoherent, poorly evidenced and inadequately justified and, at worst, is wholly ill-conceived, incoherent, unsubstantiated by the consistent application of objective criteria, irrational and unjustified and will lead to an unsustainable pattern of development. The neglect of Chigwell, compared with other locations, including significantly less sustainable locations, as a candidate for substantial Green belt release and allocation remains inexplicable and unexplained by the Plan. There is certainly no case for treating it different to other Towns and Large Villages and there is certainly no evidence for that. The Representor considers there is scope for **all** the sites involving Green Belt release promoted by itself and other Representors to be accommodated without harm to interests of acknowledged importance. It considers that Chigwell can accommodate this scale of development.

2.0 Response to the Inspector's Questions

- 2.1 ***Matter 15: Issue 1: Are the Policies P1-P15 justified, effective and consistent with national policy in the following general areas?*** The Representor has no comment on this Section including IQs 1 to 7 inclusive.

- 2.2 ***Issue 2: Are the Plan’s policies for specific places and sites within the District justified, effective and consistent with national policy; and are the specific site allocations they include justified and deliverable? Policy P7: Chigwell.***
- 2.3 The Representor’s answer to all the questions under Issue 2 in relation to Chigwell is: **“No”**.
- 2.4 The first thing to note about the Policy P7 proposals are that:
- almost uniquely for the Towns and large Villages, they involve no strategic Green Belt releases and greenfield allocations;
 - their extremely small scale, apart from the putative Limes Farm ‘allocation (CHIG R6) and the land at Chigwell Nurseries (CHIG.R5).
- 2.5 The peremptory justification at Paragraph 5.102 and 5.103 of the Plan is wholly inadequate, self-serving and inconsistent with the declared Vision and strategic policies for the Plan as a whole. There is no explanation here or elsewhere as to why Chigwell is being let off so lightly with regard to major Green Belt releases and strategic housing allocations.
- 2.6 The Representor has no comments on ***IQs ‘General Matters’ (Qs 1 and 2).***
- 2.7 The Representor generally supports the proposed allocations at Chigwell promoted by other representors to this Examination and sees no reason why this overall/cumulative scale of development cannot be accommodated at Chigwell.
- 2.8 So far as ***IQ3*** is concerned the Representor has stated previously that it considers that the proposed allocation at Limes Farm Chigwell (Chig.R6) is likely to result in the loss of valuable urban green space in a location where, having regard to dense urban character of the area and the (Socio-economic) needs of the local residents, it is most needed.

This appears to be a lazy and socially/politically insensitive option, evidently aimed at sparing wealthier, more articulate, engaged and influential residents of the District, and of Chigwell in particular, by minimising Green Belt releases and penalising the less privileged residents of the Limes Farm Estate.

- 2.9 It is also indicative of a lack of imagination on the part of the LPA since there is, with some creativity, enterprise, investment and active community engagement, there is clearly an opportunity to significantly enhance the landscape quality, the recreational utility and the biodiversity of the green spaces at Limes Farm in the context of a comprehensive estate regeneration project, which had this been undertaken sooner would have pre-empted the current proposal.
- 2.10 Whilst the Representor considers that, as well as being harmful, this allocation is *impracticable* and *undeliverable*, a well-thought out regeneration scheme *might* in due course yield *some* net housing gain, but this should not be assumed to be deliverable in the foreseeable future and, if it happens eventually, can be treated as a useful windfall. The proposal is certainly not appropriate as an explicit allocation, relied on to meet the housing provision of the Plan, given the level of uncertainty about ultimate deliverability and the number of houses the Site will yield, which is presently no more than a crude estimate.
- 2.11 The Representor has no comments on *IQs 4,5* and *6*.

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