

NB: this note replaces the CRA's response to Epping Forest District Council Submission Version Local Plan Regulation 19 Consultation 2018 dated 29th January 2018

Objectively Assessed Housing Need (paras 2.41 to 2.44)

Chigwell Residents Association (CRA) consider this is positively prepared, is justified and ought to be effective. We consider the Council's assessment OAN is robust and up to date.

The CRA considers the Local Plan Submission Version has rightly based the level of housing growth on the work and research undertaken. The CRA considers the Council's calculated OAN figure in the Plan, providing approx 11,400 new homes throughout the district over the lifetime of the plan, is robust.

The CRA do not wish to see the Plan modified to include a higher OAN figure.

Policy SP2 Spatial Development Policy

The spatial strategy is positively prepared, is justified and should be effective in general and in respect for its provisions for Chigwell as set out in Policy P7. However, the CRA considers A (iv) not to be consistent with the NPPF policy on local green space as it is too narrow in its valuing of urban open space solely in quantitative terms, the value of the land as a local amenity or where the open space forms a setting for heritage assets. We understand Limes Farm is subject to a Masterplan but residents are concerned the suggested 100 homes may not be deliverable without incursion onto local green space.

Policy P7 Chigwell

Th CRA objects to B(vii) relating to site CHIG.7, the land at Chigwell Convent as we consider it to be at odds to NPPF guidance on development of designated local green space, the protection of land with a value as a local amenity and the conservation and/or enhancement of heritage assets

The CRA consider the land was inaccurately assessed at Stage 2 Residential Sites Assessment in Chigwell (Sept 2016). This assessment failed to properly identify that the land forms part of the setting of Grade II listed buildings or accurately identify the harm that may be caused to heritage assets by development. This is contrary to item 197 of the NPPF (2018).

The same evidence report wrongly states that the development of the land may improve the character of the settlement. The evidence report does not provide analysis to demonstrate the land is either "run down" or development would be an opportunity to "improve the townscape". The proposal is considered by the CRA to be unjustified.

Regardless of any proposed future Masterplan, residents are concerned now that the suggested 100 homes may not be deliverable without incursion onto local green space. Limes Farm is the most densely populated area of Chigwell. We believe it would be prudent of the Council to clearly identify at an early stage how and where they intend to locate 100 additional dwellings within this location.

It is considered the land to the north east of Chigwell was incorrectly assessed in the Sustainability Appraisal (report produced by AECOM Dec 2017) relating to Green Belt parcel site 035.8. This wrongly states (p122) that the Green Belt review; Stage 2 (2016) concluded that the loss of this area (parcel 035.8) would cause moderate harm to Green Belt (CRA Appendix 1). The Green Belt Review Stage 2 (2016) summary of assessment for parcel 35.8 (land north-east of Chigwell) in fact states "Resultant harm to the Green Belt purposes if parcel released from the Green Belt: Very High" (CRA Appendix 2).

The LP proposal that expansion to the north east is the least harmful to the Green Belt is considered to be unjustified as the resultant harm of it's loss would be very high and is thus it not consistent with NPPF policy on Green Belt with particular reference to 143-145

Policy P7 - Changes considered necessary

Amend 5.103 to remove references to expansion of the settlement to the north east of Chigwell

Amend the Vision to read thus, "Key priorities for infrastructure within the Parish are the restoration and/or redevelopment of Victory Hall and the Members Club, collectively the Hub to provide a community resource that serves identified needs, the development of a sustainable transport policy to include on-street car charging, car parking, improved pedestrian and cycle linkages to schools, London Underground stations and the surrounding area, traffic reduction, education and health care"

Amend the Vision to read thus, "The distinctive communities of Chigwell Village, Grange Hill and Chigwell Row will be celebrated, whilst opportunities will be explored and identified with local residents for the comprehensive social, economic and environmental regeneration of Limes Farm to ensure Chigwell is an integrated village"

Amend section C Infrastructure Requirements to include Sustainable Transport