



MATTER 14

RESPONSES OF LOUGHTON TOWN COUNCIL (“LTC”)

ISSUE 1

Overview

1. Representations submitted by Loughton Town Council have made the case that the Local Plan does not provide adequate robust evidence as to how the infrastructure needed to deliver the development in the Plan will be achieved. The Plan places too much reliance on developers to deliver vital infrastructure improvements which Epping Forest District Council will be unable to control. Without these contributions, there will be a deficit in the infrastructure that can be provided which will not only affect the amount of growth which can come forward, but also the quality of life of the area.
2. The Plan has set out the extent of infrastructure improvements which may be required to facilitate the delivery of development anticipated by the Plan. The Council has not as yet undertaken the viability work to inform CIL or made a decision as to whether CIL will be adopted by the Council in the Plan period, yet the supporting documentation, for example the Infrastructure Delivery Topic Paper [EB1101C] sets out the provisions relating to s106 and CIL, reflective of national guidance.
3. Policy should make clear the weight and relevance of the Essex County Council Developers Guide to Infrastructure Contributions.
4. At page 22 of the IDP Topic Paper, indicative figures are given for CIL rates in neighbouring Boroughs, as follows:

Figure 1 Indicative CIL charges

Type of development	Indicative charge (minimum)	Indicative charge (maximum)
Residential development – Waltham Abbey ¹³ and Harlow strategic sites	£80sqm	£100sqm
All other residential development	£150sqm	£225sqm
Retail development	£80sqm	£100sqm
All other development uses	£0sqm	£0sqm

- At paragraph 5.6, for comparison, it is noted that Chelmsford’s Charging Schedule is set at £164 for residential, £197 for A1 retail and £114 for other retail, whilst Brentwood’s Draft Charging Schedule sets rates for consultation at £200 for residential, £200 for food supermarket, and £125 for all other retail.
- It is noted that the CIL viability work has not yet been undertaken. However the discussions at Matter 5 of the Examination into the Local Plan noted a potential rate of up to £225 per sqm for CIL and £3,000 per dwelling s106 cost, which was deemed a conservative estimate. In the context of the above comparisons in the IDP, however, these figures are high.

Q1 Is Policy D1 clear that any infrastructure necessary to support development must be provided up front/ in time to serve the development?

- There are extensive requirements in relation to infrastructure provision to support the growth in the Plan and a burden of this lies in and around Loughton.
- Loughton Town Council does not consider that in the context of this infrastructure burden and the identified funding gap in the IDP, there is adequate clarity in the Plan to satisfy the expectations of developers as to the timing and approach to delivery of infrastructure requirements to support growth as set out in the Plan. Further work needs to be undertaken to ensure that the Policy is clear in its expectations, supported by evidence that this is deliverable to ensure a sustainable pattern of future growth.

Q2

No further comment

Q3

No further comment

Q4

No further comment

Issue 2, 3 and 4

No further comment

Issue 5

No further comment

Loughton Town Council

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