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Your ref: SR-0970
Our ref: Chingford

Local Plan Regulation 19 Representation
Planning Policy Team
Epping Forest District Council
Civic Offices
323 High Street
Epping
Essex
CM16 4BZ

26th January 2018

Dear Sir/Madam,

EPPING FOREST DISTRICT COUNCIL

LOCAL PLAN SUBMISSION VERSION - CONSULTATION REPRESENTATIONS

LAND EAST OF SEWARDSTONE ROAD, NEAR CHINGFORD: REF SR-0970

We write to you on behalf of our client, the Wardens and Scholars of Winchester College ('Winchester College'), in respect of the above Local Plan Consultation currently being undertaken by Epping Forest District Council ('the Council'). These representations relate to land east of Sewardstone Road (A112) ('the Site') in Sewardstone, with a site reference of 'SR-0970'. The red line Location Plan is attached at **Appendix 1**.

THE SITE

The Site lies within the Green Belt, has an area of approximately 11 hectares, and is currently used as farmland. It is largely cleared and fairly uniform in nature. The large majority of the Site fronts directly onto Sewardstone Road, a road which connects Waltham Abbey to the north with Chingford to the south. The King George V Reservoir and Sewardstone Marsh to the west form the boundary with the London Borough of Enfield. The Site is bordered to both the north and south by horticultural sites, developed to a relatively high density, and farm buildings, and currently forms a gap in the development along the road.

CALL FOR SITES - DECEMBER 2016

The Site was promoted through the Council's Call for Sites on 12th December 2016, which ran alongside the Regulation 18 consultation on the draft Local Plan. The Site was being put forward for consideration given its medium to long term potential for residential development, with the horticultural sites to the north and south considered to comprise potential development opportunities in the future. The area of land identified in red on the enclosed Location Plan confirms a realistic development area based on the depth of these adjacent sites.

We note that the Council has published a list of the sites that were to be considered following Regulation 18 consultation, submitted prior the March 2017 deadline.

The promotion of the Site as a medium to long term opportunity for residential development was based on the assumption that the Council would be able to meet its housing target and identify a 5 year housing land supply. However, we concluded in our submission that if the Council was not able to meet its housing target or identify

a 5 year housing land supply, or if other proposed allocations within the Draft Local Plan were to fall away, the Site could come forward sooner. The Site would not only be able to assist in providing developable, available land to provide for future housing need, particularly as need in and around London continues to grow, but would also be able to assist with the Council's aim of distributing allocated sites around the District.

In this regard, we note that the whilst the Local Plan Submission Version allocates sufficient land for the Council to meet its housing target and identify a 5 year housing land supply (based on the previously defined OAN), we are disappointed to find that there is no evidence accompanying the submission version which sets out why this particular area of land has been discounted at this stage. Whilst we note that the Site was listed in the published list of '*Sites for consideration following Regulation 18 consultation (amended list)*' in August 2017, we note that Appendix B of the Site Selection Report 2017 (assessment of residential sites) has not been made available as part of technical supporting information. The footnote indicates that it will be made available in six weeks' time, which is after this consultation has closed.

KEY CONSIDERATIONS

DCLG Standardised Methodology for Housing Requirements

On 14th September 2017, the Department for Communities and Local Government (DCLG) published a consultation on their proposed reform to the methodology for the calculation of local authorities' housing need. In addition to this consultation, a table detailing every Local Authority's amended housing need figures was published. Many Local Authorities have experienced extremely large increases or decreases in their identified housing requirements when compared to their previously defined Objectively Assessed Need (OAN).

Of particular importance is the increase in housing needs that Epping Forest has experienced. The Epping Forest OAN is predicted to increase from 514 dwellings per annum to 923 dwellings per annum when the Standardised Methodology comes into effect. This represents an increase of 409 dwellings per annum.

It has been noted that the Council intends to proceed with an accelerated plan production programme in order to ensure the plan is capable of submission before 31 March 2018. However, the Council will be aware that it has a legal duty to only submit a plan for examination that it believes to be legally compliant and capable of being found sound. At this stage, we have concern that the approach taken by the Council to the potential for an increased housing target arising from the Standardised Methodology may put the future of the Local Plan at risk.

Lack of Justification

In line with paragraph 83 of the NPPF, the Council should take this opportunity through the preparation of the emerging Local Plan to ensure that the amended Green Belt boundaries are capable of enduring beyond the Plan period and therefore enable their intended performance in the long term. Since the Council should seek to identify additional sites to demonstrate that it is capable of addressing existing and future growth requirements, there appears to be a lack of evidence to justify the exclusion of the Site from the submission version of the Plan.

As stated above, Appendix B of the Site Selection Report 2017 (assessment of residential sites) has not been made available as part of technical supporting information; this is a key piece of analysis and Carter Jonas has been advised by the Council that this is not going to be made available until 6 weeks after the consultation on the submission version of the Local Plan closes. As such, we do not consider this consultation process to be valid or lawful and we reserve the right to comment on supporting information when it is publically available. As such, we argue the submission version of the Local Plan to be unjustified, and therefore unsound.

Green Belt

Epping District is largely rural and over 92% of the land is currently designated as being in the Metropolitan Green Belt. Whilst continuing to protect the Green Belt, the Council has acknowledged that there is very little land remaining in the District within the settlements that is not already developed.

As part of the evidence base for the emerging Local Plan, Epping Forest District Council has undertaken a Green Belt Review, which consists of two stages. The Site put forward on behalf of Winchester College was submitted to the Council after this review had taken place, however, it forms a small part of a larger parcel of land which was assessed by the Council as part of that assessment, identified as '059.1'. Whilst that assessment suggested that the release of the whole parcel would have very high harm to Green Belt purposes if released from the Green Belt, we consider that this smaller site should be considered on its own merits.

In this respect, the Site is located in the hamlet of Sewardstone, which is characterised by a predominately ribbon form of development, with residential dwellings and commercial uses lining the road which runs in a north-south direction. The majority of residential properties are located to the west of the road, with pockets of residential cul-de-sacs and commercial uses complementing the dwellings lining the road. Amongst the commercial uses are a large care home, cafes, pubs, stables and horticultural sites.

As indicated in our original Call for Sites submission, the Site is bordered to both the north and south by horticultural sites, developed to a relatively high density, and farm buildings, and currently forms a gap in the development along the road. If the Site came forward it would mirror development on the opposite side of the road. As such, when the Site is assessed against the five purposes of the Green Belt (as set out in paragraph 80 of the NPPF), it is possible to establish that the development of the Site:

- would not result in the unrestricted sprawl of large built-up areas;
- would not result in neighbouring towns from merging into one another;
- would reduce pressure on the need to release more sensitive sites for development;
- would not damage the aim of preserving the setting and special character of historic towns; and
- would assist in the future viability and vitality of Sewardstone.

As such, it is incumbent on the Council to maximise the opportunities available. This assessment confirms that the Site, when objectively assessed against the above five purposes of the Green Belt, plays a somewhat limited role. As such, we consider that the Site should be considered for removal from the Green Belt.

CONCLUSIONS

The above representations oppose the decision of Epping Forest District Council to exclude the Site from the submission version of the Local Plan, as it remains suitable, available and deliverable, and its exclusion has not been justified with evidence.

We trust that the information provided above is clear, however if you require further clarity on any of the comments made please do not hesitate to contact us; we would be willing to meet with you to discuss our client's aspiration for the site, if this is deemed to be of assistance.

We would be very grateful for confirmation that these representations have been received.

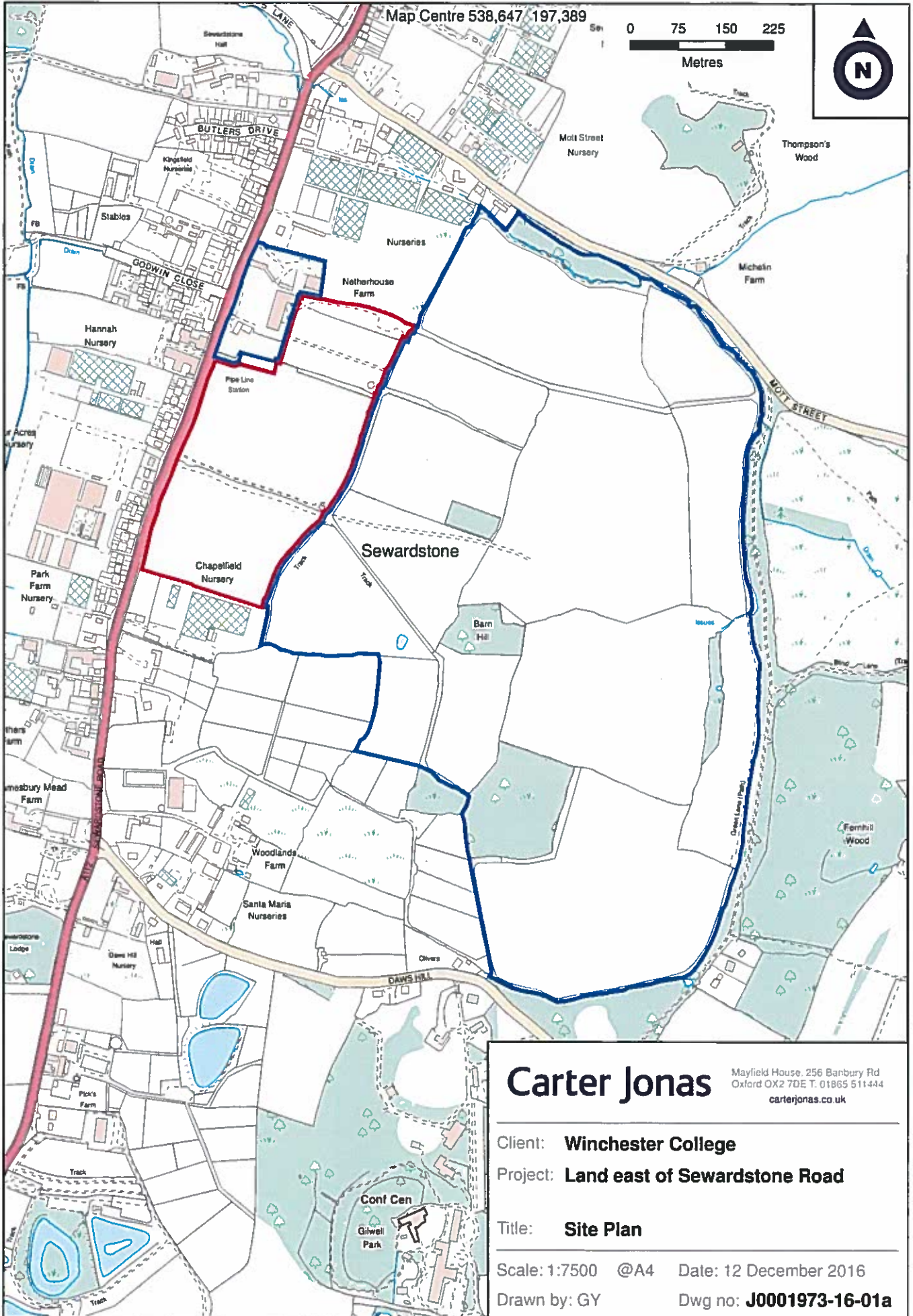
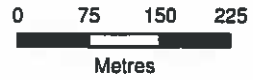
Yours sincerely

A black rectangular redaction box covering the signature of Christopher Cooper.

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Client: **Winchester College**

Project: **Land east of Sewardstone Road**

Title: **Site Plan**

Scale: 1:7500 @A4 Date: 12 December 2016

Drawn by: GY Dwg no: **J0001973-16-01a**