



**Epping Forest
District Council**
www.eppingforestdc.gov.uk



Representation form for Submission Version of the Epping Forest District Local Plan 2011-2033 (Regulation 19 publication)

This form should be used to make representations on the Submission Version of the Epping Forest District Local Plan which has been published. Please complete and return by 29 January 2018 at 5pm. An electronic version of the form is available at <http://www.efdclocalplan.org/>

Please refer to the guidance notes available before completing this form.

Please return any representations to: Planning Policy, Epping Forest District Council, Civic Offices, 323 High Street, Epping, Essex, CM16 4BZ

Or email them to: LDFconsult@eppingforestdc.gov.uk

BY 5pm on 29 January 2018

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Please attach any documents you wish to submit with your representation

Part A

1. Are you making this representation as? (Please tick as appropriate)

a) Resident or Member of the General Public or

b) Statutory Consultee, Local Authority or Town and Parish Council or

c) Landowner or

d) Agent

Other organisation (please specify)

2. Personal Details

3. Agent's Details (if applicable)

Title		MR
First Name		EDWARD
Last Name		MORGAN
Job Title (where relevant)		DIRECTOR
Organisation (where relevant)	ESSEX PROPERTY & FACILITIES	LAMBERT SMITH HAMPDEN
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Telephone Number		
E-mail Address		

Part B – If necessary please complete a separate Part B form for each representation

4. To which part of the Submission Version of the Local Plan does this representation relate?
(Please specify where appropriate)

Paragraph Policy Policies Map

Site Reference Settlement

5. Do you consider this part of the Submission Version of the Local Plan:
*Please refer to the Guidance notes for an explanation of terms

- a) Is Legally compliant Yes No
- b) Sound Yes No

If no, then which of the soundness test(s) does it fail*

Positively prepared Effective

Justified Consistent with national policy

- c) Complies with the duty to co-operate Yes No

6. Please give details of why you consider the Submission Version of the Local Plan is not legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments

SEE ATTACHED REPRESENTATION

(Continue on a separate sheet if necessary)

7. Please set out what change(s) you consider necessary to make the Submission Version of the Local Plan legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet if necessary)

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the hearings

Yes, I wish to participate at the hearings

9. If you wish to participate at the hearings, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

10. Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination (Please tick)

Yes No

11. Have you attached any documents with this representation?

Yes No

Signature:

[Redacted Signature]

Date:

29/1/18

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Lambert Smith Hampton on Behalf of Essex County Council Property and Facilities as Landowner

Introduction

At the outset we would like to raise some concern over the consultation process in connection with the Regulation 19 plan and timescales given for proper and due consideration of representations submitted to the plan. The consultation period has run over the Christmas period which will impact on many organisations and individuals being able to give full consideration to all the issues it raises and policies it proposes. In addition, the timescale for the submission of the plan to the Secretary of State, scheduled to be just two months after the consultation closing, in our view, leaves wholly insufficient time for representations to be investigated, interrogated and considered adequately by the Planning Authority. There is a fear that without areas of common ground being established early on with respondents in the process, that significant pressure will be placed on the EIP process and its timescale to address all issues fully in this forum.

In respect of the overall strategy of the Local Plan there are concerns which pertain primarily to housing supply, providing for identified needs (most particularly affordable housing), and its delivery over the plan period. The Local Plan does not robustly justify that it is planning sufficiently positively for adequate delivery of housing (there are particular concerns around the initial five years of the plan), and could be overlooking opportunities for delivery to significantly boost the supply of housing.

The public sector has been requested by Central Government to contribute significantly with its assets to address the housing crisis that the UK faces and our clients are the freehold owners of a site which can make a valuable contribution in this area.

We expand on our concerns below which could have implications for the robustness of the plan:-

Housing Supply and Objectively Assessed Housing Need (OAHN)

Draft Policy SP2 – Spatial Development Strategy 2011-2033

Housing Need and Supply

- Policy SP2 identifies a requirement for new homes within the EFDC area to be 11,400 units over the course of the plan period. The requirement is derived from the Strategic Housing Market Assessment (2015) and later updates on the Objectively Assessed Housing Need (OAHN) (2016 and 2017). The latest of these updates (July 2017) indicates an overall housing need of 51,700 dwellings for the Strategic Market Housing Area over the plan period. Of this the EFDC area's Full Objectively Assessed Need is concluded to be 12,573 dwellings. We are concerned that EFDC are therefore not proactively planning to provide for the requirement. This therefore shows a shortfall of 1,173 units being planned over the period. As far as we can ascertain there has been no agreement as to where this shortfall will be catered for in Epping or the wider HMA.

It is also contended that the above requirement is also likely to be a significant under-estimate of need in the context that:

- a) Against the baseline set for OAN assessment for the 2014 Household Projections, notionally a higher figure of 52,728 Dwellings is derived as opposed to 51,700 Dwellings currently assumed across the assessment area (of which it is noted 15,049 dwellings would be assumed for the EFDC area against an adopted requirement of 11,400 dwellings).
- b) The approach undertaken to OAN assessment does not seek to properly address the backlog of provision and under delivery of housing by EFDC over the plan period since 2011. It is notable that the number of completions of residential units in the District has failed to meet their target since 2011 with on average only 43% of the target being met since this time which has contributed to greater pressing need in all areas of EFDC.
- c) The annualised requirement target has been derived by the 'Liverpool' rather than 'Sedgefield' method advised by DCLG which skews considerably the 5 year supply requirement spreading backlog requirements over the whole plan period. Had a timely local plan been brought forward, with a robustly prepared SHLAA, in accordance with the NPPF this issue could have been addressed in a positive manner at the beginning of this plan period. We would also contend that the consistent and persistent under-delivery achieved by EFDC since 2011 means that a 20% buffer on provision, rather than the 5% buffer currently assumed, should be applied. The application of the alternative assessment criteria would derive an annualised requirement of 1049 units to be delivered per year in the next 5 years of the plan period to adequately meet the 5 year requirement as opposed to the 661 units derived. On this basis (and generously assuming that all the current allocations and the proposed housing trajectory are deliverable) only a 3.3 year supply of 5 year housing land supply could be identified. In relation to a 5 year supply under the Liverpool method this also appears to fall below that required at 4.6 year supply.
- d) In addition to this we would caution that a significant element of the proposed 5 year supply falls within the last two years of the period which in itself presents heightened risk to meeting the immediate pressing needs. We therefore have concern that inadequate provision is being demonstrated to meet proposed supply.

- e) Calculations undertaken by the standard methodology currently proposed by Central Government in the consultation paper 'Planning for the Right Homes in the Right Places' would translate, according to DCLG, to an annualised requirement of 923 units for the EFDC area throughout the plan period. This would increase the current annualised assumption of provision of 518 units by approximately 78% and would also suggest that the current level of need within the area is being underplayed by the Local Planning Authority.

In this context and given the severity of the housing and affordability crisis that faces the UK and this area particularly, these factors, in our view, require significant further review of the site allocations to establish their robustness or otherwise, so that proper, proactive planning for market and affordable housing is undertaken across the EFDC area. We remain concerned that the current approach to housing growth does not go far enough in contributing to 'significantly boosting' Housing Land supply and may only serve to deepen the acute crisis of affordability for the vast majority of those seeking to access housing.

Spatial Development Strategy

Given the high risks to under-provision, a significant, urgent and fine grained re-appraisal of Green Belt and other assets needs to be considered to meet requirements over the plan period given that the majority of the District is tightly constrained by Green Belt Designation.

Against the current assumed requirement of 11,400 dwellings for the period 2011-2033, 8,064 remain to be identified (see table 2.3 p. 29 of the submission plan). The Local Plan seeks to allocate 3,900 dwellings (or 48.4% of the housing still to identified in the period 2011-33) in and around Harlow.

The strategy of locating the significant bulk of new housing in Strategic Allocations around Harlow is challenging and could be argued as unbalanced given the severe affordability issues that exist within the wider Epping Forest District Area. As can be seen at Figure 1.5 of the Local Plan, Harlow has an overall affordable housing need only marginally greater than the average for England. In comparison Epping Forest District has a substantially higher need over the plan period when compared to Harlow, the HMA, East Herts, Uttlesford and Greater London. The over reliance on smaller sites within the District with allocations where affordable housing will not be provided points to the continuing of a trend when only 8% affordable housing is provided in areas of the most acute need.

The Local Plan states (para 2.57) that Harlow represents the most sustainable location, and notes "above all, the wider economic growth aspirations of the town". This is agreed but this does not negate the requirement for providing to meet the pressing needs elsewhere in the District, which could also enable sustainable development and delivery of housing, and where there are even more severe needs, particularly for affordable housing.

We would note that currently there are some relatively high risks to Strategic delivery given there are substantial infrastructure challenges:-

- Page 15 of IDP Part 2 does not adequately identify how infrastructure will be delivered at Harlow to meet the trajectory of EFDC, particularly as regards the expected financing of projects.

- The IDP identifies critical and essential infrastructure upgrades, which have a high potential to cause delay to delivery, be beyond the Council's control and allow persistent under delivery to continue through Short, Medium and Longer Term timescales.

The plan does not explain what contingency plan there might be if delivery in these more uncertain and inherently riskier longer term projects do not materialise or are significantly slowed from their assumed rates of provision.

We feel that the opportunities for allocation of housing sites within areas of pressing housing need have been missed and may not have been robustly interrogated and investigated. Of particular note we would raise concern over the robustness of the findings, methodology and assumptions made in:

- The Assumed Settlement Hierarchy
- The Stage 1 and 2 Green Belt Review

These particularly pertain to comments that our clients would make as regard to land which they own freehold in Chigwell and relate specifically to Draft Policy P7.

Draft Policy P7

Chigwell Area Site Proposals

The current assumption is that the Chigwell area will now cater for approximately 376 additional residential units over the plan period (a lowering the requirement from the Regulation 18 consultation plan by 64 dwelling units from 430).

Part of this reduction in unit numbers is through the deletion of the previous site allocation of the Former Beis Shammai School Site (ref SR-0433) where 29 new homes were envisaged. The site has subsequently been disposed of to an education institution and is now not available or deliverable for housing.

Other changes to the envisaged housing land supply are the deletion of SR-0601 (Land at Grange Farm) where 30 units were previously proposed and the deletion of 115 units from the plan period for proposals to regenerate and intensify density through the use of public open space at the Limes Farm Estate.

Four new allocations have been identified (2 now with planning permission). Of these proposal sites three are within or adjacent to Chigwell Row and one in Grange Hill. In total the Sites R1-R3 provide for an estimated 46 units (of which 25 units (R2) will be for assisted living purposes). Site R4 is stated to be for specialist housing needs of 105 units. It is understood that if this site were to be redeveloped for other purposes then further consideration would need to be given to the unit yield of the site as a Green Belt Location. Sites R2 and R4 are Green Belt releases.

We have not reviewed in detail all of the potential deliverability issues that may be encountered in the delivery of these sites but we do see that only 106 units are expected to be provided for Chigwell area in the 5 year supply where past delivery rates should be placing greater emphasis on the early years of the plan to deliver more quickly.

It is also noted that about ¼ of the units allocated to Chigwell are new units to be built on existing public open space at the Limes Farm Estate where units are thought potentially to be able to be delivered during the last three years of the plan period and will be subject to master-planning detail. There is no information in the public domain that gives confidence that this masterplan could realistically intensify the use of the estate to the extent proposed and currently there is insufficient clarity on what levels of open space provision would in the end be expected for residents within this area. This in our view casts not inconsiderable doubt on assumptions that such development and intensification can be achieved, albeit that it is expected over the longer term.

In terms of the other sites it is noted that no affordable housing is to be provided at the specialist or assisted living proposals which will leave a paucity of opportunity for the delivery of basic needs affordable tenures within the area. In addition two of the sites proposed are located within Chigwell Row which is understood to be a substantially inferior location in respect of sustainability criteria (a settlement which scores 8 in the Hierarchy Technical Paper). We expand on this further below.

Chigwell in the Settlement Hierarchy

As identified by the Settlement Hierarchy Technical Paper 2015 Chigwell scores highly for existing services and facilities. It has a population of 12,987 which behind Loughton / Debden and Waltham Abbey is the largest population centre in the District.

Chigwell has a number of education and health facilities, along with a good range of local retail shops, banks and pubs/restaurants. It also has a number of community facilities including places of worship, a community hall, leisure and recreation facilities and a library. Most importantly Chigwell has excellent transport links with good regular bus services and a London Underground station on a branch of the Central Line.

Within the Settlement hierarchy paper, Chigwell's sustainability appraisal scores 20 and is classified a large village. Towns in the District (a further tier up the spatial hierarchy) require a score of 21+. There does not appear to us to be any reasoned justification as to why this scoring system has been adopted or a threshold of 21 applied to the hierarchy and appears wholly arbitrary. The scoring methodology for this assessment it is understood, is required to be relatively simple, however that there is no weighting to different sustainability factors does in our view end up misrepresenting the benefits/dis-benefits of different settlement areas.

Whilst it is understood that potential growth in a constrained District is, to an extent, opportunity driven, it would certainly appear anomalous that North Weald (where there is no rail infrastructure and a significantly lower sustainability score (15)) has large scale designations in excess of four times the expected residential units at Chigwell.

It is also notable, that when the initial assessment of potential residential unit yield was examined in plan formulation there was seen to be insufficient capacity and quantum to meet Objectively Assessed Needs requirements. As a result, a further review of lands adjacent to Chipping Ongar, Epping, North Weald Bassett, Waltham Abbey, Theydon Bois, Lower Sheering, Roydon and Sheering, were undertaken to seek to identify sites where there may be potential for further capacity. It does seem illogical, given Chigwell's sustainability credentials and an appreciated need in the area, that reconsideration or reappraisal was not given to sites adjacent to Chigwell at the same time?

The assessment of the Spatial Strategy and Hierarchy, in our view, requires further examination with a view to achieving a sustainable pattern and dispersal of development throughout the District and should be required to put meeting needs first (particularly affordable housing needs) where these are most acute.

In our view Chigwell, given its sustainability characteristics, should be accorded significantly more responsibility in housing delivery and should rightly be viewed as a 'Town' rather than large village in the context of this hierarchy.

The Site and Proposals

Essex Property and Facilities freehold ownership at Hill Farm, High Road, Chigwell is an opportunity which could contribute very positively to much needed housing growth in a sustainable location. The site is approximately 15 hectares in total and proposals submitted by Essex Property and Facilities partner, Meridian Hill Residential Ltd are to develop a low density residential scheme relating well to the landscape and neighbouring development. Approximately 11 hectares of the site are previously developed where former landfill operations have been undertaken. A level of remediation has been undertaken of this area and further remediation is planned in order to create a large publically accessible open space serving Green Belt purposes if proposals for development at the site frontage and boundary areas can be brought forward.

The site has excellent advantages and would cater for growth in an area of acute need. We consider the following to be highly relevant:-

- Able to provide approximately 100 high quality family residential units within the 5 year time horizon.
- Approximately 2/3 of the site will be fully remediated from previous landfill operations and remodelled to provide accessible public open space for the benefit of all Chigwell residents.
- The open space retained in the scheme will enable the development and enhancement of existing and new habitats for wildlife, flora and fauna to the benefit of biodiversity.
- Able to provide a policy compliant level of affordable tenures.
- Ease of access to London Underground services (0.8 miles to Chigwell Station) and local retail and other amenities.
- Adopts a form of development that will enhance the character of the existing settlement and work within the existing landscape and protected tree constraints to deliver a scheme which compliments and augments the landscape, its setting and the character of the area.
- Easy access to public bus services W14 (270 m), 275 (450 m). There is a bus stop on the A113 immediately adjacent to the neighbouring Childers estate.
- The site adjoins an existing secondary school minimising the potential need to travel by car for this major travel attractor.
- Able to provide a class C2 care facility to care for 60 people and generate 14 full time jobs
- The development proposals would augment further noise attenuation via bunding and enhanced acoustic screening from the M11
- The site presents the opportunity to remediate land fully and introduce public access where there are no further obligations to do so.
- The site is able to be developed without detriment to assets or areas of historic interest.

At this stage, In terms of the site suitability Stage 2 assessment of the Chigwell site we would also wish to draw attention to some inaccuracies that we believe to have been made in initial assessment. It is understood that revised suitability assessment proformas have been undertaken in accordance with further review in 2017; however, these are not available at this time.

- **Liability to Flood** - The site is assessed as being within EA Flood Zone 2. This is not correct. The whole site lies within EA flood zone 1 and should therefore have scored positively on assessment.
- **Bus transport** – there is a bus stop adjacent to the site and within 250 m meters the assessment should reflect this.
- **Archaeology** – The site is not subject, as far as we are aware, to any archaeological designations or areas of search. Given past use of the majority of the site as a landfill site it is not thought likely that there may be potential for high quality archaeological assets.
- **Agricultural Land** – The site has been landfilled and does not therefore impact on land with a classification for the best and most versatile agricultural classification. This should therefore be scored positively in assessment.
- **Tree preservation** – Whilst a TPO exists on the site, the nature of the limited development proposals work to retain significant parts of the existing tree cover and vegetation and to supplement with further planting. The existing trees will be an important part of the mature landscape setting and amenity for development and it is not accepted that TPO trees could preclude all development at the site.
- **Contamination** – the site was a former landfill and has been subject to a level of remediation. The promoters for the site have held extensive discussions and resolved a suitable contamination and remediation strategy that will ensure the land is fit for residential and recreational open space purposes. The former landfill area is to be kept free from built development with some remodelling and reforming to develop pleasant and accessible open space to the benefit of all residents in the locality. Built development will be limited to areas of inert and construction waste which can be suitably contained within construction to provide land fit for residential purpose via a clean cover system.
- **Topographical Constraints** – aligned to the above there would be some remodelling of landform that would be desirable but this is not assessed as being a constraint to delivering the form of residential development envisaged and should not be seen as potentially precluding all development.

Green Belt Review

EFDC has adopted a sequential strategy which seeks to minimise the use of Green Belt land for development, whilst focusing development in the most sustainable locations and this approach is supported and seen to be broadly compliant with Government Advice.

The District is, however, significantly constrained by Green Belt designation and it is appreciated that development in settlements and non-green belt areas can only go part of the way to meeting housing needs. However, it is our view that additional opportunities exist which could meet the additional housing supply required, and could come forward in the short term without significant detriment to Green Belt purposes.

Since the Local Plan adoption in 1998 there here have been no alterations to green belt boundaries. The Council have now undertaken a two stage Green Belt Review as part of the Plan evidence base. This has examined sites at a strategic level examining relatively large parcels of land.

It is our view that the methodology employed does not really adopt a sufficiently fine grained enough approach when examining smaller areas of Green Belt as within the larger assessment areas, discrete parcels can have markedly different attributes when set against the purposes of including land within the Green Belt designation.

It should also be noted that the review seeks to introduce criteria in the Green Belt assessment which generally lie outside of an objective test of green belt purposes (such as landscape value, general site suitability / availability factors for housing).

To be robust the analysis should concentrate on land meeting or not meeting Green Belt purposes and should be fine grained enough to more fully reveal the variations in how land performs against the purposes of the Green Belt. The extent to which the Green Belt would be compromised by the loss of the parcel either in part or its entirety or in combination with other parcels is really the fundamental issue to be determined.

It is our view, that Epping Forest should undertake a stage 3 review of Green Belt and follow such a finer grained approach. This would provide more accurate differentiation in the parcels and would enable the Council to release smaller parcels of land from the Green Belt, whilst ensuring an overall low level of harm according with Policy in the NPPF. Our views as to a finer grained approach to parcel DSR-036.3 and the proposed development at Hill House, Chigwell in respect of the purposes of the Green Belt are outlined below:-

Purpose 1: To check the unrestricted sprawl of large built-up areas

The M11 provides a strong boundary to the west/north-west. Development of the site would be limited to the south-east, and would be contained and framed by West Hatch School which provides a well-defined and defensible boundary. The extent of development proposed would have little effect on the overall expansion of the conurbation as it represents an infill between the developed areas of Woodford Bridge and the school. The remainder of the site would be open space fully compatible with and reinforcing Green Belt purposes.

Purpose 2: Prevent neighbouring towns from merging

Proposed development of the site would be set back from the A113 frontage with informal open space and retention of mature and significant amenity trees and further planting so as to safeguard the limited sense of separation between Chigwell and Woodford Bridge that current exists. To the west the development would be limited to the south east of a line of properties in Waltham Road the western limits of the West Hatch School. The layout would reinforce the strong defensible boundary of the Motorway.

Purpose 3: Assist in safeguarding the countryside from encroachment

The development site is not considered to be countryside and has characteristics of urban fringe land. It is not connected or related to any extensive tracts of open countryside which lie beyond the M11 which provides a strong defensible boundary. For the great extent of the north-eastern boundary, the adjacent secondary school buildings perform a similar function.

The development land and proposed open space has been significantly altered by previous uses of the site, and the land could not be utilised for land uses defined as appropriate development within the Green Belt without very extensive and costly intervention where there is no further obligation to do so.

Purpose 4: To preserve the setting and special character of historic towns

It is fully appreciated that there is no relationship between the parcel and any historic town or conservation area and does not have any relationship with listed or other historic structures.

Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

It is considered that the proposals will contribute to this purpose through the restoration of significant land for open recreational purposes in accordance with appropriate use and development within the Green Belt.

Overall there is felt to be a low level of harm through the development of the Hill House site to Green Belt purposes.

Conclusions

- There is some doubt and concern that the plan will provide sufficient housing to meet objectively assessed needs both in terms of immediate 5 year housing land supply requirements and a sufficient and robust supply in to the longer term. The indicators point to an approach taken which may fall short of meeting objectively assessed needs.
- The proposed settlement hierarchy has not been determined on a sufficiently robust analysis and the current disposition of housing allocations places too much reliance on large strategic sites adjacent to Harlow which carry not insignificant risks to delivery in relation to infrastructure requirements. If these risks are borne out there is no mechanism proposed by which EFDC would adopt as a contingency to the under-delivery that would occur.
- The placement of Chigwell in the settlement hierarchy is erroneous and seemingly arbitrary to seek to justify a lower allocation of the overall housing requirement for this locality.
- It is accepted by all that to meet housing needs that Green Belt releases will be required. The Green Belt review undertaken does not currently adopt a fine grain enough approach to determine the potential for smaller areas of green belt within larger assessment areas to come forward in sustainable locations to help meet needs.
- The designation of land at Hill Farm Chigwell has significant advantages in terms of delivery, sustainability, delivering publically accessible open space and jobs which have not been adequately considered and can assist very substantially in meeting immediate pressing housing needs.
- The designation of the Hill Farm site would bring forward publicly owned land which is despoiled and has the potential to meet pressing needs in a sustainable location according with Central Government's drive to make the best use of publically held assets to contribute to addressing the Housing Crisis.

Essex County Council Property and Facilities as landowner supports the detailed approach of its promotion partner Meridian Hill Residential Ltd to addressing the constraints of this site and bringing the land forward for much needed housing and open space for public access.