



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	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Oliver"/>
Last Name	<input type="text"/>	<input type="text" value="Bell"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Associate Director"/>
Organisation (where relevant)	<input type="text" value="St Congar Provincial c/o Agent"/>	<input type="text" value="Nexus Planning"/>
Address Line 1	<input type="text"/>	<input type="text" value="3 Weybridge Business Park"/>
Line 2	<input type="text"/>	<input type="text" value="Addlestone Road"/>
Line 3	<input type="text"/>	<input type="text" value="Weybridge"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="KT15 2BW"/>
Telephone Number	<input type="text"/>	<input type="text" value="01932 837850"/>
E-mail Address	<input type="text"/>	<input type="text" value="o.bell@nexusplanning.co.uk"/>

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

Please see attached representations

(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.

Please see attached representations

(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:

Due to the complex and significant nature of our concerns, it is vital that we are able to participate in the oral hearing sessions.

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.

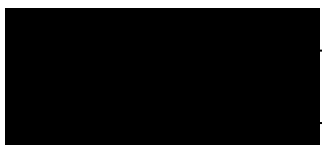
10. Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination (Please tick)

Yes No

11. Have you attached any documents with this representation?

Yes No

Signature:



Date:

Representations to Policy SP 6 Green Belt and District Open Land

1. Nexus Planning is instructed by St Congar Provincial to prepare representations to the Submission version of the Epping Forest District Local Plan (EFDLP). St Congar Provincial control land at Old Farm, Chigwell (the site).
2. A significant proportion of the District is covered by Green Belt and the Council is clear that due to the high housing needs, exceptional circumstances exist to review the Green Belt boundaries (see paragraph 2.136 of the EFDLP). Furthermore, we note that even when pursuing a Plan that proposes to accommodate an objectively assessed housing need (OAN) which we consider is demonstrably too low, a number of Green Belt releases are still required.
3. Map 2.5 of the EFDLP identifies the proposed Green Belt boundary alterations. St Congar Provincial considers that the Local Plan is proposing substantially too few Green Belt releases in light of our comments in respect of OAN, and fails to even acknowledge the need to consider safeguarded land (paragraph 85 of the NPPF).
4. Furthermore, having regard to our representations in respect of Policy SP 2 regarding the source of housing pressures, in particular the demand for housing in locations with strong commuting links to the City of London (and London in general), such as Chigwell, it is apparent that there is a significant lack of development proposed in the southern part of District. Whilst it is noted significant development is proposed within the built up areas of Loughton and Buckhurst Hill, our fundamental concerns with this strategy (building on open space) have been identified in our representations to Policy SP 2.

Green Belt Assessment: Stage 2

5. Having regard to the above, our specific comments relating to the site are set out below.
6. Land at Old Farm, Chigwell falls within parcel 035.8 of the Green Belt Assessment: Stage 2, measuring 27.97 hectares in size. Land controlled by St Congar Provincial covers circa 50% of this parcel (largely the southern section).
7. Having reviewed the Green Belt Assessment, it is apparent that parcel 035.8 is the weakest performing site in Green Belt terms around Chigwell, with only Green Belt purpose 3 (safeguarding the countryside against encroachment) scoring more than a 'moderate' rating.

However, in this regard, it is important to note paragraph 5.4 of the Green Belt Assessment, which states the following:

"The results of the assessment against purposes 1, 2 and 4 (i.e. excluding purpose 3), illustrated in Figure 4.6, provide a more nuanced picture of how Green Belt performs across the District. This may provide the Council with a better tool and evidence base upon which to make decisions about the performance of Green Belt across the District and those locations where Green Belt release may be more appropriate."

8. Figure 4.6 of the Green Belt Assessment demonstrates that when assessing the parcel against purposes 1, 2 and 4, parcel 035.8 would only result in 'moderate' harm to the Green Belt as a result of its release.
9. Furthermore, the Council's SA confirms that removal of this parcel from the Green Belt is least harmful relative to other options around the settlement i.e. the most appropriate area for release in Green Belt terms. It is also of note that the scoring for this parcel is comparable or lower (i.e. weaker in Green Belt terms) than many other sites proposed for release from the Green Belt across the District.
10. Despite the above, it is noted that the Green Belt Assessment concluded that the topography of the parcel is such that it slopes away from the settlement, creating a stronger relationship with the countryside than the village and that the eastern boundary along Green Lane is relatively weak, being defined by intermittent hedgerows. Nevertheless, this would form an identifiable boundary, having regard Table 3.1 of the Green Belt Assessment, albeit a 'weaker boundary'. Further, paragraph 3.3 of the Green Belt Assessment acknowledges that it can be appropriate to use 'weaker boundaries' to define new Green Belt boundaries but consideration needs to be given to potential strengthening, which St Congar Provincial would more than willing to deliver and this is an approach the Council appears to be adopting on other allocated sites.
11. In addition to the above, St Congar Provincial is aware that the Council has granted planning permission for planning application ref. EPF/2899/15 at Chigwell Primary Academy to the north of Old Farm, Chigwell. This application was for:

"Major refurbishment of Chigwell Primary Academy (reserved matters) and enabling residential development (outline) comprising 32 no. detached residential properties together with associated off-street parking, dedicated parking court for existing residents, garden space, new vehicular accessed from High Road (A113) and Vicarage Lane, external landscaping and associated development."

12. Such a scale of development inevitably means that the school and adjoining land no longer fulfils the purposes of including land in the Green Belt and should be removed, as is proposed by the EFDLP. However, in doing so, the currently proposed Green Belt boundary has clearly jumped Vicarage Lane, leading to a new logical Green Belt boundary which follows dense

hedgerow and tree lines. A range of suggested revised Green Belt boundaries around Chigwell are shown in our representations to Policy P 7.

Safeguarded Land

13. Paragraph 85 of the NPPF is clear that local planning authorities should identify areas of safeguarded land in order to meet longer-term development needs stretching well beyond the Plan period. Paragraph 83 advises that new Green Belt boundaries should be capable of enduring beyond the plan period.
14. It is clear that even based on a calculation of OAN that is demonstrably too low (see our representations to Policy SP 2), housing needs for this Plan period require a significant quantum of land to be released from the Green Belt. Indeed, paragraph 5.17 of the Council's own Green Belt Assessment: Stage 2 states the following:

"On the basis of current trends, there are likely to be unmet housing needs beyond the plan period. We therefore recommend that EFDC considers the need for safeguarded land. Where areas of the Green Belt are identified as being suitable for release in this plan period, parts of them may be retained as safeguarded land. The location of such areas should be informed by this study and other evidence."

15. It is therefore difficult to see a realistic scenario in which a review of the Local Plan or the preparation of a new Local Plan would not require the release of further Green Belt land to meet development needs. The Council's currently proposed review mechanism could result in a review arising only three years post adoption and at the longest in five years (having regard to the Housing White Paper). Accordingly, the Council should seek to identify safeguarded land at this stage of the Local Plan preparation in order to comply with the NPPF and avoid further reviews in the near future. Such an approach would also enable an accelerated delivering of housing following any partial review and ultimately will help boost the supply of housing, in accordance with paragraph 47 of the NPPF.
16. For the reasons set out above, Policy SP 6 is unsound having regard to the tests set out at paragraph 182 of the NPPF as it is not positively prepared in failing to be based on a strategy that meets full objectively assessed development requirements and it is contrary to national policy, namely paragraphs 83 and 85 of the NPPF.

Suggested Change

17. The extent of Green Belt allocations should be increased to deliver the full objectively assessment development requirements and further Green Belt land should be safeguarded to meet future development needs beyond the Plan period.