

Land at Hill House, Chigwell

Representations on the EFDC Local Plan
Submission Version Consultation



Boyer

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1. INTRODUCTION

- 1.1 The following representations have been prepared by Boyer on behalf of our client, Meridian Hill (Chigwell) Ltd, in respect of the Epping Forest District Local Plan Submission Version Document 2017.
- 1.2 We have previously submitted representations on behalf of our client in relation to the Community Choices Issues and Options Consultation in 2012, and the Draft Local Plan Consultation in 2016.
- 1.3 Our client has an interest in the former landfill site at Hill House Farm in Chigwell. The site has been subject to a scheme of some restoration but there are no planning conditions attached to the former landfill operation requiring any further restoration.
- 1.4 The site abuts the existing built-up area and it is in close proximity to existing local facilities, services and public transport in the area. The total site is approximately 14ha and the proposed development consists of c100 dwellings, provision of a Care Home, and public open space. A copy of the Site Location Plan and Proposed Masterplan is included in Appendix 1.
- 1.5 Prior to submission of the representations, we raised concern over the consultation timescales and that no additional time was allowed for such a major consultation, given it was taking place over the Christmas period. Furthermore, concern was also raised that the Site Selection Report Appendices (2017) were not available for consideration. Regulations require that the Plan must be published in full in order for meaningful representations to be made and we understand this should include other supporting documents. The Site Selection Report Appendices (2017) are therefore a key part of the evidence base/supporting documents for people to consider and review as part of the Local Plan. As a result, it is impossible to determine whether the plan meets the tests of soundness set out in the NPPF.
- 1.6 Our representations on the Local Plan are set out below in relation to the relevant sections and proposed policies. In particular this considers if the authority has met the legal requirements and whether the Local Plan meets the tests of soundness. The representations are set out as follows:
 - Section 2: The Spatial Development Strategy
 - Section 3: The Green Belt
 - Section 4: Chigwell
 - Section 5: Land at Hill House, Chigwell
 - Section 6: Other Relevant Policies
 - Section 7: Conclusion

2. THE SPATIAL DEVELOPMENT STRATEGY

Policy SP2 Spatial Development Strategy 2011-2033

- 2.1 As per the previous Local Plan consultation, policy SP2 continues to identify a minimum housing requirement of 11,400 new homes. This is informed by the SHMA 2015 and additional OAHN Updates. It is not considered the housing requirement identified is sound for a number of reasons, as set out below:

Objectively Assessed Housing Need (OAHN)

- 2.2 The SHMA Update 2017 identified the full objectively assessed housing need for Epping Forest District over the plan period 2011-2033 is 12,573, or 572 per annum. It is noted in the Housing Implementation Strategy¹ that this figure is accepted by the Council, however the Local Plan² does not make provision for the full OAHN, with a minimum shortfall of 1,173 dwellings.
- 2.3 Despite recognising the higher OAHN, there has been no further consideration by EFDC whether this can be met within its administrative boundaries. The Council state (Para 2.6 of the Housing Implementation Strategy) that *'The Council is satisfied that the approach set out within the MoU will ensure that the OAHN within the HMA as a whole will be met over the course of the Plan period'*. However the MoU agreed in March 2017, prior to the publication of the SHMA Update 2017.
- 2.4 The SHMA Update 2017 was carried out following concerns raised by the Inspector for the East Hertfordshire District Plan Examination. In this case the Inspector found that at the time East Herts was maintaining a lower requirement that would not be an approach to OAN and the housing requirement that is consistent with national policy.³ East Herts then revised their housing need figure to 18,396 to meet the OAN in full, as set out in the SHMA Update 2017. At the time the additional work was undertaken, East Herts indicated⁴ that the MoU dealing with the distribution of Objectively Assessed Housing Need across the West Essex / East Hertfordshire Housing Market Area would be updated to reflect the last agreed position across the HMA. However the MoU was not updated following the OAHN update. Furthermore East Herts' Examination Hearing Statement for Matter 2 on Housing set out that the provision of a minimum of 18,396 could be met in full, providing that other local planning authorities in the housing market area were also able to meet their share of the overall housing need identified.

¹ Housing Implementation Strategy (December 2017) Para 2.6

² Local Plan Submission Version Paragraph 2.56

³ Inspector's Note 1 to East Hertfordshire District Council (May 2017)

⁴ East Herts Council Answers to the Inspector's Note 1 (June 2017)

- 2.5 A review of Harlow and Uttlesford emerging Local Plans also refer to the MoU March 2017, and meeting the SHMA Update 2017 OAHN. Harlow indicate the agreed provision of 3,900 to assist meeting Epping Forest District needs, however there is no discussion in the draft Plans regarding specifically meeting the additional shortfall of 1,173 units from EFDC OAHN. Epping Forest remains the only local authority within the HMA not seeking to meet its full identified OAHN. The agreed MoU does not provide any certainty on how the shortfall would be met.
- 2.6 Notwithstanding the above, as previously identified, we continue to have concerns with the identified OAHN of 12,573 is unsound and this figure should be higher:
- The OAHN 2017 adjusts the uplift applied from the original SHMA, reducing this from 20% to 13.6%. Para 3.24 of the SHMA OAN 2017 Update sets out that *'the housing market signals demonstrate continued affordability pressures in the HMA and there may be argument to maintain the 20% uplift previously proposed by the original SHMA in the context of the approach taken in similar areas.'* However it sets out that the increase would be difficult to justify in the context of implications for net migration and average household sizes. There is no discussion of whether any higher uplift has been tested in between 14% and 20%.
 - Furthermore, the OAHN should be higher again, given the adjustment to the demographic starting point of the DCLG 2014-based household projections. For Epping Forest this sets out a starting point of 15,049 dwellings over the plan period. Across the HMA the DCLG 2014-based household projects result in a requirement of 52,728 dwellings. As such this would lead to an additional shortfall than the existing planned provision.
- 2.7 It is clear from the above, that Epping Forest are not meeting the full objectively assessed needs, in accordance with the NPPF para 47.

Government's 'Planning for the right homes in the right places'

- 2.8 This consultation took place in Autumn 2017 and set out a number of proposals to reform the planning system to increase the supply of new homes. It included a standard methodology for calculating local authorities' housing need. For Epping Forest this identifies a higher housing requirement of 923 dpa, a 78% rise from that currently planned for. This would result in a shortfall of 351 dpa from the current planned provision. For the other HMA authorities it also showed an increase in housing requirements. This is the reason the Council have sought to accelerate the Local Plan to examination, to avoid having to meet this need in the immediate future. However, the NPPF para 14, is clear that local authorities should positively seek opportunities to meet the development needs of their area.

- 2.9 It is clear that further increased housing need will be an issue for the next local plan. Given that the NPPF requires that Green Belt boundaries should endure and not need to be reviewed at the end the plan period, this plan should be taking into account likely future growth levels and remove land from the Green Belt now. Sufficient flexibility should be planned for at this stage, particularly given the constraints in Epping Forest, and the acknowledgement that a release of Green Belt land is necessary. Furthermore, given the various stages of the other HMA authorities, in particular Harlow and Uttlesford will have to take this into consideration as they are not at an examination stage.

Backlog / Undersupply of Housing

- 2.10 The Local Plan supporting text (paragraph 2.60) correctly identifies that national planning policy sets out an expectation that any existing backlog is taken into account and delivered in the plan period. The Plan seeks to rectify this undersupply and provide for a five year supply of housing land by identifying smaller sites, which offer an opportunity to achieve speedy delivery of new homes when compared with larger, strategic sites. Whilst we agree with this approach in principle, it is not adequately addressed in the Plan and neither does it accord with national policy. The NPPF para 17 Core Principles includes that *'every effort should be made objectively to identify and then meet the housing...needs of an area, and respond positively to wider opportunities for growth'*.
- 2.11 The Council plan to address this over a longer period, and this is further expanded in the Housing Implementation Strategy and Housing Trajectory. However it is not considered the Council have gone far enough.
- 2.12 The Housing Implementation Strategy⁵ sets out that there has been a significant undersupply of 1,778 units between 2011/12 and 2016/17, based on the identified housing requirement of 11,400 new homes. Paragraph 2.9 of the Housing Implementation Strategy continues that taking this undersupply into account as part of the housing requirement over a 5 year period (Sedgefield Method) works out 874 dwellings pa over 2017/18 to 2020/21, or spreading this out evenly across the remaining years of the plan period (Liverpool approach), results in a lower annualised requirement of 629dpa.
- 2.13 The Council recognises that Planning Practice Guidance sets out that local authorities should aim to deal with any undersupply within the first 5 years of the Plan period where possible, and if not they will need to work with neighbouring authorities under the duty to cooperate. However, the Council sets out that there are three main reasons why the 'Liverpool Method' is the most appropriate. However it is not considered these reasons are justified, and the undersupply should be met within the first 5 years of the Plan, in accordance with the PPG Guidance (Paragraph 035 Reference ID: 3-035-20140306):

⁵ Housing Implementation Strategy December 2017, pages 4 - 6

- It is considered the Council have been too narrow in their approach in the Site Selection Process, and additional sites could come forward in the short term, in sustainable locations. Furthermore it has not been possible to review the Site Selection Process in full as the appendices to the Site Selection Report (2017) were not available.
- It is agreed that the average housing completion has been low, however this is not a sufficient reason to justify a lower provision, and for those reasons of previous low delivery, every effort should be made to address the shortfall now. The rate of delivery in Epping Forest has been directly influenced by the out-of-date local plan which makes no provision for housing delivery beyond 2011 and is based on the housing requirements of the Essex Structure Plan (2,400 dwellings in the period 1996-2011). The 2006 Alteration (adopted in 2008) contains no housing allocations again referring back to Structure Plan requirements that have already been satisfied. Delivery over the last 10 years or so has been characterised by windfall schemes, which will inevitably be low in a local authority that is characterised by significant areas of Green Belt. In these circumstances, past delivery rates have been artificially suppressed and do not reflect demand.
- It is noted the Council make reference that they are seeking confirmation that none of the neighbouring authorities are able to contribute towards the undersupply, however there are no further details on this discussion. A review of Uttlesford's most recent consultation draft Plan indicates they had no request to meet any neighbouring authority need, and there is no reference in the meeting minutes available between the authorities.
- The council are incorporating a trigger for partial review should the Plan consistently fail to deliver the housing requirement. However, this is not appropriate where Green Belt release may be required. One of the features of the Green Belt is its permanence. The NPPF requires planning authorities to satisfy themselves that green belt boundaries will not need to be altered at the end of the plan period (para. 85). Any potential shortfall cannot therefore be addressed by way of a partial review. If there is likely to be a shortfall, sufficient land and/or safeguarded sites should be identified at this stage.
- Furthermore, this undersupply is likely to be higher given the concerns with the OAHN.
- As discussed in more detail in Section 3, it is not considered the Council have analysed the Green Belt sites in sufficient detail, and therefore additional sites are likely to be available to come forward.

Additional Buffer

- 2.14 Despite acknowledging that there has been a significant undersupply since 2011, the Council apply only a 5% buffer referring to historic delivery against the East of England Plan which included a significantly lower housing requirement. This does not accord with paragraph 47 of the NPPF. There has been a persistent under delivery since 2011, resulting in a significant undersupply of 1,778 dwellings. The 20% buffer should therefore be applied.

5 Year Housing Land Supply

- 2.15 The Council indicate that the 5 year future housing requirement 2017/18 to 2021/22 is 3,304, with a projected supply off 3486 dwellings, and therefore a 5.3 year supply⁶.
- 2.16 However as demonstrated in the table below when applying the required 20% buffer, this reduces to 4.6 years. This still utilises the Council’s suggested OAHN and the Council’s preferred Liverpool approach for meeting backlog across the plan period. It is clear the estimated supply will not meet the 5 year requirement.
- 2.17 Addressing the backlog with the Sedgefield approach, in accordance with PPG, and still using the same OAN, plus the 20% buffer would significantly reduce the 5 year housing land supply position to 3.3 years.
- 2.18 Both scenarios above are still dependent on the sites coming forward as expected, and therefore there is every possibility this could reduce further. It is also likely to reduce further, given the concerns expressed with the housing requirement figure and the OAHN.
- 2.19 There is a further inconsistency with the Council positions on 5 year housing land supply, as a current appeal (ref EPF/3062/16) concedes that the Council can currently only demonstrate a 1.35 year supply of land for housing purposes. It is therefore unclear how the Local Plan suggests 5.3 year supply for the same 5 year period.
- 2.20 The Plan therefore fails to identify, in accordance with NPPF para 47, a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements, Given the concerns regarding the OAN, and that the housing requirement should be higher, the housing supply would likely reduce even further.

Table 1 Council’s OAN Liverpool Approach plus 20% Buffer

Year	Housing Requirement	Cumulative requirement	Estimated delivery	Cumulative delivery	Shortfall / Surplus	New Cumulative Shortfall
2017/18	755	755	301	301	-454	-454
2018/19	755	1,510	696	997	-59	-513
2019/20	755	2,265	636	1,633	-119	-632
2020/21	755	3,020	825	2,458	+70	-562
2021/22	755	3,775	1,028	3,486	+273	-289
5 year supply Calculation	(3486 (total supply) / 3,775 (five year housing requirement)) x 5 years					4.6 years

⁶ Housing Implementation Strategy December 2017 Page 11

Table 2 Council's OAN Sedgefield Approach plus 20% Buffer

Year	Housing Requirement	Cumulative requirement	Estimated delivery	Cumulative delivery	Shortfall / Surplus	New Cumulative Shortfall
2017/18	1049	1049	301	301	-748	-748
2018/19	1049	2098	696	997	-353	-1101
2019/20	1049	3147	636	1,633	-413	-1514
2020/21	1049	4196	825	2,458	-224	-1738
2021/22	1049	5245	1,028	3,486	-21	-1759
5 year supply Calculation	(3486 (total supply) / 5,245 (five year housing requirement)) x 5 years					3.3 years

Housing Supply and Distribution

- 2.21 There is a level of inconsistency with Council's approach in terms of housing supply and distribution. Despite the Council indicating they are only planning for a minimum of 11,400 new homes, the housing trajectory indicates a total housing supply of 13,152 new homes. However this does not accord with the spatial distribution of new homes set out in policy SP2, which only adds up to 9,816 new homes. It is appreciated taking into account completed sites since 2011, and windfall sites, this adds up to 11,400, but it does not indicate the spatial distribution of the additional 1,752 units included within the housing trajectory. This appears to indicate some level of doubt over the planned supply coming forward. As identified above, there is a shortfall of supply planned for the next 5 years.
- 2.22 It is also not clear, how the projected supply would provide sufficient affordable housing over the plan period. The SHMA Affordable Housing Update 2017, identified the overall affordable housing need in Epping Forest over the plan period is 3,100 dwellings. Given the level of infrastructure required for some planned sites, and the limited provision from existing permissions, (as demonstrated in Section 4 for Chigwell), there is concern that affordable housing needs will not be met. There appears to be an unbalanced provision and distribution of housing, with no clear evidence in the Infrastructure Delivery Plan how required infrastructure will be delivered.
- 2.23 The Plan fails to sufficiently demonstrate in accordance with NPPF paras 47 and 50, for market and affordable, deliverable sites to provide 5 years worth of housing, but also concerns regarding the expected rate of delivery through the housing trajectory for the plan period. As a result, the Plan would not contribute sufficiently to creating mixed and balanced communities in accordance with para 50 of the NPPF.

- 2.24 The evidence base is not sufficient to justify the Plan's strategy and it is considered that additional sites are available to come forward in the short term without significant detriment to Green Belt purposes. A finer grain approach to the Green Belt Review is necessary, and further details on this are set out in Section 3.
- 2.25 It is welcomed that Chigwell is identified in policy SP2 to provide new homes, however it is considered that Chigwell is a sustainable location that could accommodate additional units and this should be considered for additional growth. This is discussed further in section 4.

Contingency Plan

- 2.26 We do not agree with the proposed contingency plan. It is also not clear where the target of 75% was derived from, and it would still be a considerable shortfall of dwellings per annum, if this was 80% or 90%.
- 2.27 If a partial review was triggered by this, then not only would the Council have to consider infrastructure capacity but they would also need to consider a further release of Green Belt land, which is incompatible with NPPF para. 85 and the need for Green Belt boundaries to endure beyond the plan period. A partial review could also create a vacuum of lack of supply whilst the partial review is completed.
- 2.28 As identified above, given the Council are undertaking a Green Belt Review at this stage, every effort should be made at this point to identify sufficient and deliverable sites to come forward. This should identify additional sites to come forward in the short term, and build in potential for reserve sites given that the OAHN is likely to increase in the next local plan.

Summary Policy SP2

- 2.29 Overall, there continue to be serious concerns that the Local plan would not make sufficient provision for housing to meet need and insufficient supply coming forward until the later stages of the plan period. If the Council cannot demonstrate that there will be a five year supply at the point of adoption the Plan will be found unsound. Additional sites are needed which will enable the Council to demonstrate a five year supply and finer grain approach to the Green Belt is necessary to determine additional sites within the administrative boundary.
- 2.30 It is not considered Policy SP2, and the Plan, has been prepared in accordance with the NPPF para 182, tests of soundness.
- 2.31 The plan is not considered to be positively prepared in seeking to meet the objectively assessed development requirements.
- 2.32 The housing requirement identified and 5 year housing supply approach are not effective or justified by the evidence base. A higher housing requirement is necessary to meet the objectively assessed need, and additional sites are required, particularly in the short term, to provide a 5 year housing land supply.

2.33 Policy SP2 is not consistent with national planning policy, and there is some concern over the Duty to Co-operate in the Council seeking assistance from neighbouring authorities in terms of the unmet OANH and backlog.

3. GREEN BELT

Policy SP6 Green Belt and District Open Land

- 3.1 As set out in our previous representations, it is recognised that the Council is pursuing a strategy which seeks to minimise the use of Green Belt land for development, whilst focusing development in the most sustainable locations. However, it is considered 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.
- 3.2 It is recognised that there have been no alterations to green belt boundaries since the adoption of the 1998 Local Plan. As identified in section 2, one of the features of the Green Belt is its permanence. The NPPF requires planning authorities to satisfy themselves that green belt boundaries will not need to be altered at the end of the plan period (para. 85). Any potential shortfall cannot therefore be addressed by way of a partial review. If there is likely to be a shortfall, sufficient land and/or safeguarded sites should be identified at this stage. Whilst the Council have undertaken a Green Belt Review Stage 1 and 2 as part of the Plan evidence base, it is clear that the Green Belt Review has adopted a strategic level of reviewing large parcels of land. It does not go far enough and fails to review and assess individual smaller parcels of land and their contribution to the Green Belt.
- 3.3 Furthermore, the Plan paragraph 2.142 makes reference that the Green Belt Review information has been used in addition to considerations relating to the characteristics of the sites such as biodiversity and landscape value, along with final choice of sites for release have been informed by its suitability and availability. However, biodiversity and landscape values, and whether the site is suitable and available, do not form considerations of whether the sites should continue to be protected by Green Belt. Further reference is made to the Site Selection Report, however the site specific appendices for the 2017 document were not available to review.
- 3.4 The Council's approach is similar to that undertaken by Welwyn Hatfield Council in their Green Belt Review. During the Local Plan Examination, the Inspector published a Green Belt Review note, setting out initial thoughts that relate to soundness and additional work that the Council should undertake to expand the findings of the Green Belt review. The Inspector outlined that he did not consider the development strategy put forward to be sound, in part because there was insufficient justification for the failure to identify sufficient developable sites within the Green Belt.
- 3.5 The Inspector went on to confirm that "*a finer grained approach would better reveal the variations in how land performs against the purposes of the Green Belt*". Furthermore, the Inspector confirmed that "*Openness considerations in a Green Belt context should only be concerned about the absence of built development and other dominant urban influences. They should not be concerned about the character of the landscape.*"

- 3.6 The Inspector continued that “*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 clearly the fundamental issue to be analysed*”. A copy of the Inspector’s Note is included in appendix 2.
- 3.7 In accordance with this, it is stressed that Epping Forest should review their Green Belt Review document and adopt a finer grained approach. This would provide differentiation in the smaller parcels and would enable the Council to release smaller parcels of land from the Green Belt, whilst ensuring an overall low harm.

Green Belt Review Critique Parcel DSR-036

- 3.8 To support this, a Critique of the Green Belt Review Stage One and Two has been undertaken by The Landscape Partnership (appendix 3). This report considers the landscape-related findings of the Review with particular regard to a parcel of land at Hill House, Chigwell, Essex (the site). The critique confirms that “*within the study area, there are variations in the contribution that different parcels of land make to the five identified Green Belt purposes, with the result that some parcels contribute less to purposes than others*”.
- 3.9 The Council’s Green Belt Review includes the site within parcel DSR 36 (Stage One) and parcel 36.3 (Stage Two). The critique identifies a number of inconsistencies with the scoring of the parcel, compared to other parcels, identifying where the parcel should have been scored as a lower contribution to the NPPF para 80 Green Belt purposes.
- 3.10 Parcel DSR-036 has discreet areas of parcels that are considered to contribute less to the Green Belt purposes, however this is not recognised by the Green Belt Review. Overall, the parcel as a whole should have scored a total of 5, compared to the 11 points indicated, with weak and relatively weak contributions to the Green Belt purposes.
- 3.11 The Stage Two report includes the site within parcel 036.3, which also extends north-eastwards and encompasses the grounds and playing fields of West Hatch High School, land between the school and the motorway, and the gas transmission station and the grounds of Cedar Park. Therefore whilst it is a smaller parcel than the Stage One, it still contains a number of disparate land uses with varying characteristics and with very different effects on the delivery of the Green Belt purposes. As such, the critique completed by The Landscape Partnership provides commentary as to the role that the Hill House site itself plays in contributing to the Green Belt function. This is summarised below.

Land at Hill House, Chigwell

- 3.12 The Stage Two parcels were assessed against the purposes of the Green Belt, except Purpose 5 (assisting urban regeneration). The Green Belt Review Critique provides comments as to the contribution that the Hill House site makes and how successful the Green Belt would be in achieving its objectives if the boundaries were to be amended so as to exclude the site from the Green Belt.

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

- 3.13 The M11 provides a strong boundary to the west/north-west. Any development of the site would be limited to the south-east, and would be contained by the first strong defensible boundary, the school. Any development would have little effect on the overall expansion of London, since it would represent more of an infill between the developed areas of Woodford Bridge and the school. The remainder of the site would be open space.

Purpose 2: Prevent neighbouring towns from merging

- 3.14 Development of the site would be set back from the A113 frontage and so safeguard the limited sense of separation between Chigwell and Woodford Bridge that currently 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

- 3.15 Given the previous uses of the site, it cannot be considered to be countryside. It is not connected to any extensive tracts of open countryside and so development would not therefore lead to any extension of the built area into an open tract of countryside or Green Belt.
- 3.16 The M11 provides a strong defensible boundary, and for much of the north-eastern boundary, the adjacent school buildings do likewise.
- 3.17 The land 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.

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

- 3.18 There is no relationship between the parcel and any historic town.

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

- 3.19 Stage Two Review did not consider the contribution to delivering Purpose 5, however, land uses at the site include evidence of previous engineering works, spoil heaps and over-tipping.

Summary of Assessment

- 3.20 The Hill House site's scores very low when assessed against the purposes of the Green Belt. The site's location, bound to the north by the M11 and the south and east by existing residential development, contributes to the fact that the site is unable to sprawl into neighbouring towns or indeed contribute to the sprawl of urban areas in the countryside and beyond.

- 3.21 As confirmed in the supporting “Critique of Epping Forest District Council Green Belt”, “*It is considered that Parcel 036.3 is one such parcel, and that were it released from the Green Belt, there would be overall Low harm to the Green Belt purposes.*”

Table 3 Green Belt Review Critique Land at Hill House, Chigwell

Purpose	Contribution	Scoring
To check the unrestricted sprawl of large built-up areas	Relatively Weak Contribution	1
To prevent neighbouring towns merging into one another	Relatively Weak Contribution	2
To assist in safeguarding the countryside from encroachment	Weak contribution	1
To preserve the setting and special character of historic towns	No Contribution	0
To assist in urban regeneration	Not Assessed	Not Assessed
Total		4

4. CHIGWELL

Policy P7 Chigwell

- 4.1 Policy P7 Chigwell allocates a number of sites to deliver 376 homes. This is reduced from the previous draft Local Plan which indicated 430 homes. However we consider that Chigwell is a sustainable location that could accommodate additional units and therefore it should have been considered for additional growth.
- 4.2 Table 5.1 sets out the Settlement Hierarchy in Epping Forest District, and it identifies Chigwell as a 'Larger Village'. This was following the completion of the Settlement Hierarchy Technical Paper 2015. Chigwell scores high for existing services and facilities. It is identified as having a population of 12,987, only Loughton-Debden and Waltham Abbey have higher populations. It has a number of education and health facilities, along with local retail shops, banks and pubs/restaurants. It also has a number of community facilities including places of worship, community hall, leisure and recreation facilities and a library. Importantly it has regular bus services and an underground station, being a loop branch for the Central Line.
- 4.3 Within the Settlement Hierarchy Paper, it identifies that Towns are locations which score 21+, whilst larger villages are designated based on scores of 14-20. Chigwell scores 20 and therefore a Larger village. No explanation is given as to how the thresholds were set. Chigwell misses out by a single point, but is then classified as a Larger Village along with North Weald and Theydon Bois which perform significantly less well, scoring 15 and 17 respectively.
- 4.4 Although North Weald scores 5 points fewer than Chigwell, North Weald is allocated 1,050 homes and Chigwell just 376. It is clear that Chigwell performs significantly better than other Larger Villages and should be allocated a higher level of development, and should also be designated as a Town.
- 4.5 The area has access to a range of sustainable modes of transport, in particular access to the Central Line. The updated Infrastructure Delivery Plan 2017 discusses the Central Line capacity and sets out '*In the assessment and subsequent re-assessment, growth in any settlement which would result in an increase in eastbound or westbound peak hour travel of over 3% was considered to have a material impact on the expected peak use of the 'Central Line, and growth in any settlement which would result in an increase of over 10% was considered to have an impact on the capacity of the stations to accommodate this growth in demand. No settlements were found to have an increase of more than 10%, and only two (Epping and Loughton-Debden) were found to have an increase of over 3%. Most of the planned growth is therefore not expected to have a material impact on the capacity of the Central Line within Epping Forest District (though it may have an impact on the capacity of the Central Line or wider TfL network as a whole).*' As such additional growth could be accommodated in Chigwell and not impact on the capacity of the Central line. The previous version of the Local Plan also identified capacity for additional growth, up to 430, and it is considered that should be increased.

Vision

- 4.6 We support that the vision for Chigwell focuses on brownfield sites and sustainable Green Belt release. However, it is considered the vision is over restrictive in seeking to maintain the gap between Chigwell and Woodford to the west. This is not supported by the evidence base, as discussed further below.

Spatial Options

- 4.7 It is noted that para 5.103 sets out the Council's considered most appropriate spatial options; including intensification within the existing settlement; expansion of the settlement to the north east; and intensification of Chigwell Row settlement.
- 4.8 The Sustainability Appraisal⁷ sets out that the Western Expansion Spatial Option was discounted due to harm in Green Belt terms. However, this is again overly restrictive as it applies a blanket approach to the western side, with specific reference to 035.7, 038.1 and 0.39.1 which scored strongly against Purpose 2. However, it has been demonstrated in Section 3 above that additional land can be released from the Green Belt, and there would be overall Low harm to the Green Belt purposes. Furthermore, the SA also sets out that the strategic option is less sensitive to change in landscape terms compared to other strategic options. The majority of this option also lies within Flood Zone 1 and it is identified as a sustainable location, in close proximity to Chigwell Underground Station.
- 4.9 Other options such as the north eastern expansion, are more sensitive to change in landscape terms, and in less sustainable locations, as evidenced by the Sustainability Appraisal. Furthermore, Chigwell Row scores a relatively low 8 in the Settlement Hierarchy Technical Paper, and therefore is a less sustainable location for development.

Proposed Allocations

- 4.10 The Site Selection Report 2017 appendices were not available for consideration, and therefore whilst the Site Selection Report sets out the stages of consideration and sifting out sites, without the appendices it was not possible to consider whether the proposed allocated sites were adequately considered, and also whether discounted sites were considered sufficiently. A number of errors were previously identified in the Site Selection Report 2016, and therefore it was unknown if this was updated as part of the 2017 version. Given the restrictive application of the spatial options, it also prevented more suitable sites for development, such as Hill House, Chigwell to be considered for allocation.
- 4.11 There is concern with the proposed allocations in terms of the limited contribution the sites would make to future infrastructure requirements or affordable housing provision. The small minor developments are unlikely to make a significant contribution to providing a sustainable, inclusive, and mixed community, as required by the NPPF Paragraph 50.

⁷ Sustainability Appraisal Appendix V: SA of Strategic options for settlements – Page122

4.12 Whilst it has not been possible to view the site preforms for each proposed allocation, due to the unavailable Site Selection Report Appendices 2017, from a review of the information available and the proposed allocations with permission, and previous comments on sites, we note the following:

- (i) CHIG.R1 – whilst this has planning permission, it is 100% market housing, with no affordable provision. It is noted provision is also made for Public Open Space, to be transferred to the Parish council but no other contributions.
- (ii) CHIG.R2 – This is a care home and retirement apartments only. Whilst outline planning permission has been granted, there are no affordable housing units (with a contribution only), and a local early years contribution.
- (iii) CHIG.R3 – Planning permission has been granted, but there are no financial contributions and no affordable housing provision.
- (iv) CHIG.R4 – An application for this site has been refused, whilst it is noted the case officer report refers to the Local Plan process, the application outlined there would be no affordable units, with an off-site contribution only.
- (v) CHIG.R5 – Concern was previously raised with this site, as it is not clear why the existing use would be lost, and no details on why it is no longer suitable for its current use. The Site Selection Report 2016 had previously set out the availability of the site is unknown.
- (vi) CHIG.R6 – It is noted the net capacity appears to have reduced from 210 units to 100 homes. However as mentioned above we have not been able to review this in detail, due to the lack of information available. However concerns were previously raised in terms of whether the number of units proposed could be achieved and this would result in the loss of open space. It is noted this is not expected to come forward until later in the Plan period.
- (vii) CHIG.R7 – We previously raised concern regarding the site and the impact on adjacent heritage assets. The site is adjacent to two heritage assets, however no details are available on how the heritage impacts could be mitigated particularly given the degree of open views.
- (viii) CHIG.R8 – Given the size, unlikely to make any contributions or make any affordable housing provision.
- (ix) CHIG.R9 – A previous application for the site was refused on heritage grounds. A revised application is currently pending consideration but there is indication if the heritage grounds can be overcome. Also given the limited number of units, it is unlikely to contribute to affordable housing or other infrastructure.
- (x) CHIG.R10 – We previously raised concerns with allocations in Chigwell Row as part of the neighbourhood plan representations. Chigwell Row is identified as a small village and is less suitable for development given the lack of access to services and facilities. Also given the limited number of units, it is unlikely to contribute to affordable housing or other infrastructure.
- (xi) CHIG.R11 – Given the limited number of units, and again this is unlikely to contribute to affordable housing or other infrastructure.

- 4.13 From the above it is clear that the sites with planning permission (approx. 46 units), make no affordable provision, and make very little contribution to infrastructure requirements. It is likely to increase to a minimum of 183 with no affordable housing and limited infrastructure contributions, almost 50% of the total proposed allocation for Chigwell. Given the extant permissions and the concerns with the remaining proposed allocations, it is not clear how they would achieve part C of policy P7 in relation to infrastructure requirements.

Summary Policy P7 Chigwell

- 4.14 Whilst development within Chigwell is supported, it is not considered the Policy meets the NPPF para 182, test of soundness.
- 4.15 It is considered that Chigwell is a highly sustainable location and this should be recognised in the level of planned growth. The Plan should make provision for additional housing. It is not considered the spatial options in Chigwell are justified, the western spatial option is in a more sustainable location to accommodate growth, and additional sites in the Green Belt could come forward that would result in low harm. A further review of the Green Belt is necessary.
- 4.16 Furthermore there is concern that the proposed allocations are not justified or positively prepared. It has not been possible to review these against the full evidence base due to the Site Selection Report Appendices 2017. There is also concern that the allocations would not be consistent with NPPF paras 47 and 50, with other more sustainable sites available that could also make more of a contribution to infrastructure requirements, and achieving a mixed and sustainable community.
- 4.17 Overall it has not been positively prepared to seek to meet objectively assessed development requirements, and additional sites should be identified for Chigwell.
- 4.18 As such it is considered Policy P7 is unsound.

5. LAND AT HILL HOUSE, CHIGWELL

- 5.1 As set out above, there is a clear need for additional housing development to come forward over the Plan period. Furthermore, it has been demonstrated that the spatial options for Chigwell are over restrictive, and given the sustainable nature of the area, this should be reflected in the planned growth for the area. Land at Hill House, Chigwell is considered a suitable site for development to come forward in a sustainable location.
- 5.2 The site abuts the existing built-up area and it is in close proximity to existing local facilities, services and public transport in the area. The total site is approximately 14ha and the proposed development consists of approximately 100 units, plus a Care Home and public open space. See appendix 1 for the site location plan and proposed Masterplan.
- 5.3 The site has been subject to a scheme of some restoration but there are no planning conditions attached to the former landfill operation requiring any further restoration. The site is overgrown discouraging any effective use as public open space. There are no public rights of way through the site, albeit a byway extends along the western boundary.
- 5.4 As part of the proposals, approximately 2.9Ha of land would be developed for residential, 0.5ha as Care Home, and the majority of the site 11.3ha would be restored for public open space use and landscaping. This would provide a strong green setting for the site and provide an important local amenity for the local community that could be fully utilised.
- 5.5 The site is well located to access public transport, and therefore reduces reliance on the road infrastructure. The site is approximately 0.8miles walking distance to Chigwell tube station. The nearest bus stops served by non-school buses are at Cross Road about 270m from the site which are served by bus service W14. To access the 275 eastbound service the nearest bus stops are near the Chigwell Road/Manor Road Roundabout about 450m from the site with the westbound service accessible from the bus stop on Roding Lane North 550m away. The 275 services run from Barkingside via Woodford, Highams Park, Walthamstow to St James Street Station with a bus service frequency of approximately 20minutes for weekdays and Saturday with a reduced service on Sunday. The W14 runs between Woodford Bridge and Leyton via South Woodford with a similar bus frequency to the 275 service. There are also bus stops just to the north at West Hatch School which are served by the 804 and 667 school bus services. These services terminate/begin at the school with the 804 travelling from Debden to the north via Loughton and the 667 from Ilford to the south. The site adjoins the secondary school offering easy access on foot and by bicycle. Nonetheless, the development would be subject to consideration of any improvements or mitigation works required in relation to highways
- 5.6 The promotion of the site is supported by a suite of documents, as summarised below.

Contamination Report

- 5.7 An additional Geo-Environmental Assessment was undertaken to supplement the extensive contamination investigation works. A copy of the report is included as Appendix 4. This has been prepared following consultation with Epping Forest District Council Environmental Health to provide further certainty from the previous assessments undertaken at the site. This included completion of gas monitoring undertaken on eleven occasions, over a twelve month period.
- 5.8 The report concludes that identified risks at the site can be mitigated by removal of either the source, pathway or receptor. The report is based on proposed development comprising residential properties with private gardens at Parcels A and C. Parcels B and D are proposed to be public open space.
- 5.9 With reference to Parcel A, no significant remediation is deemed necessary as this areas appears to not have been landfilled. Remediation will be necessary for Parcel C to make the land suitable for residential use, and ground improvement is proposed and will require material to be excavated and processed. Processing made ground in Parcel C would significantly reduce the ground gas source in this area. Additional mitigation is proposed to remove gas risk from adjacent parcels, by installing a passive 'venting trench'.
- 5.10 Parcels B and D are occupied by two distinct mounds, and the proposed use is public open space. A number of potential methods are proposed to prepare these parcels in order to assist in managing the ground gas regime as well as reducing the risk of exposure to contamination. The mound in Parcel D will be extended to assist in acting as a noise bund from the adjacent M11. There is potential to reduce the height of the Parcel B mound, with to be capped with a layer of clean cover and ventilation cowls installed with response zones within the in-situ fill to allow ground gas to be dispersed to air. This would manage the gas regime, as well as a suitable contoured mound for public open space. Material excavated from the mound in Parcels B / C would be sorted and any substantially non-degradable fill would be transported to the low lying area in Parcel D to form the core of the noise bund extension.
- 5.11 Overall from the numerous phases of investigation and assessment it is considered that the site would be suitable for its proposed residential, care home, and public open space subject to the remediation proposals.

Landscape and Visual Impact Assessment

- 5.12 A Landscape and Visual Impact Assessment (appendix 5) was undertaken for the site to assess the likely landscape and visual effects of the proposed development.
- 5.13 The development occupies only a small portion of the site, most of which would be utilised as public open space. The proposed development would be contained by woodland and landform within the site and would have little influence on landscape character beyond the site boundary, or on any publicly accessible visual receptors or residential properties.

- 5.14 The scheme includes a number of primary mitigation measures which would reduce any adverse effects, and it is considered the proposed development could be accommodated without significant residual effects on landscape character.
- 5.15 No significant residual visual effects experienced from publicly accessible viewpoints or residential properties in the surrounding landscape were identified.
- 5.16 Overall, there would be limited residual landscape and visual effects arising from the proposed development and such effects would be confined to the site itself; it is considered that such effects would be acceptable.

Green Belt Review

- 5.17 As set out in Section 3 in more detail, the need to make sufficient provision in terms of housing supply based on the objectively assessed housing requirement means that additional will need to be released from the Green Belt. Whilst the land at Hill House lies within the Green Belt, it is considered that the site is better related to Chigwell centre, and lies within a highly sustainable location. A Critique of the Green Belt Review was undertaken by The Landscape Partnership (appendix 3) and this found the land at Hill House, Chigwell scores very low when assessed against the purposes of the Green Belt and were it released from the Green Belt, there would be overall Low harm to the Green Belt purposes
- 5.18 The proposed development at Hill House Farm would provide much needed dwellings to meet the District's future need, whilst ensuring that there is limited harm on the purpose of the District's Green Belt and no damaging impact on the wider countryside.

Ecology Reports

- 5.19 An Extended Phase 1 Habitat Survey and various Phase 2 ecological surveys and assessments (badgers, bats, small and medium-sized mammals, reptiles, GCN, dormice, wintering birds, breeding birds and invertebrates) were undertaken to assess the sites biodiversity value. A copy of the reports are included as appendix 6.
- 5.20 The surveys found that through implementing mitigation measures, it is considered that all significant adverse impacts from the proposed development would be mitigated. It is also worth noting that the mitigation identified, are standard requirements including a management plan, precautionary construction techniques, lighting strategy, along with provision of bird boxes, and habitats. Overall the residual impact was considered to be neutral to minor positive.

Tree Survey

- 5.21 An Arboricultural Impact Assessment was completed for the site (appendix 7) and whilst there is a TPO on site this would not severely limit feasibility for development. The tree survey has been confirms the site comprises in part mature trees and also self-sown areas of woodland, of low and moderate arboricultural value. Recommended tree removals are mainly of a low value and their removal would have a negligible impact on the visual amenity of the area.
- 5.22 Provided tree protection and methods of work close to trees outlined in this report are followed, the impacts on the remaining trees would be negligible. Furthermore, it is proposed trees are retained where they represent an important amenity feature and/or can assist in achieving a mature landscape setting within the housing development.

Other Material Planning Considerations

- 5.23 Development of the site would have a positive impact upon the character of Chigwell by replacing a current vacant landfill site with high quality residential dwellings and accessible open space. The proposed development would provide a significant, well-designed and accessible area of public open space. Built development would avoid the area of household waste.
- 5.24 The reuse of the site would therefore have a positive impact upon Chigwell by both protecting existing Greenfield sites elsewhere around Chigwell, whilst making the effective reuse of a vacant, derelict piece of land which currently makes little contribution to the streetscene or wider area.
- 5.25 Both the emerging Local Plan and the emerging Neighbourhood Plan identify there is a clear need for affordable housing within the District. The development of the site would meet the policy requirement for affordable housing and as such it would make a significant contribution to boosting the affordable housing supply in the area.
- 5.26 The development would also contribute to the need for housing for older persons. DCLG's Household Projections, set out that the number of older persons in Epping Forest that are living in Communal Establishments is set to increase by 535 persons between 2011 and 2033, which represents a 51% increase in Communal Establishment population projections. This growth is the equivalent of 3.68% of the District's total OAN figure.
- 5.27 Planning Practice Guidance states that Local planning authorities should calculate housing provided for older people, including residential institutions in Use Class C2, against their housing requirement, and the approach taken towards specialist older persons housing (including site allocations) should be clearly set out in their Local Plan. There is a clear need for communal establishments for the elderly in Epping Forest and the proposed development would contribute to meeting this need.

- 5.28 Overall the proposed mix of housing types (market, affordable, and care home) would contribute to achieving a mixed and sustainable community, as required by NPPF para 50. The provision of the care home, would also make provision for new jobs which is considered a significant benefit and would contribute to the economy in Chigwell.
- 5.29 As identified, the site would be surrounded by a large area of public open space and landscaping, measuring approximately 11.3 hectares. This area of public open space would be accessible to both the new residents, and the wider public, and contain mature trees, meadows and an existing watercourse. The public open space would allow wildlife corridors to be created, along with the introduction of native plant species.
- 5.30 The site comprises in part mature trees and also self-sown areas of woodland that would be retained where they represent an important amenity feature and/or can assist in achieving a mature landscape setting within the housing development. The retention of substantial areas of existing vegetation and the introduction of new planting together with a programme of regular management works would mitigate the visual effects and it is considered the residual visual effects would be of low significance.

Strategic Land Availability Assessment / Site Selection Report

- 5.31 The site is also considered as part of the Strategic Land Availability Assessment (SLAA) published in July 2016, site reference SR-0037. This forms part of the evidence base for the emerging Local Plan. It identifies the site as suitable for housing, but within the Green Belt. It recognises that the site is a former landfill site but that site can be remediated viably. It sets out the site is available, achievable and deliverable. The neighbouring site (SLAA ref SR-0366) West Hatch high school playing fields and adjacent land was previously identified in the emerging Plan as a possible new employment site, however it is noted this has not been taken forward.
- 5.32 The site is also included as part of the Site Selection Report 2016. However a number of errors were identified in the Site Suitability Assessment Stage 2 Assessment and highlighted as part of the previous Representations. As the appendices have not been made available for consideration, we cannot provide any comment on whether these errors have been taken into account or corrected. It has been noted elsewhere as part of these representations, the shortcomings of the Site Selection Report 2017.
- 5.33 As such for the avoidance of doubt, the errors in the 2016 version are included again below:
- 1.5 Impact on BAP Priority Species – the site is score as a negative impact as it is within the BAP priority habitat and that there is likely to directly impact, which may not be able to provide suitable mitigation. However for other similar sites within a BAP a neutral impact is achieved as they take account for mitigation. It is therefore unclear how it has been determined mitigation would not be possible in this case. Nonetheless, as discussed above suitable mitigation is possible to ensure no unacceptable adverse impact.
 - 1.7 Flood Risk – the site is not within Flood Zone 2, therefore it should be scored as significantly positive

- 1.8b Archaeology – given the previous use of the site as a former landfill it is not clear how it has been assessed as potential for high quality archaeological assets
- 2.1 Green Belt – As discussed in Section 3 and above, we do not agree with the green belt assessment.
- 3.2 Bus service – the site is within 400m of a bus stop therefore it should score positively
- 4.1 Brownfield and greenfield Land – the assessment does not take into account the previous landfill use was not fully restored
- 4.2 Agricultural land – the site is not in use as agricultural land and is landfilled so it would not result in it being classified as best and most versatile agricultural land, therefore this should be scored positively.
- 5.1 landscape – as set out above there would be no significant harm in terms of visual impact.
- 5.2 settlement character – it is not considered the development would detract from, the existing settlement character
- 6.1 topographical constraints – there are no topographical constraints that would preclude development
- 6.3 TPO – whilst there is a TPO on site this would not severely limit feasibility for development. A tree survey has been undertaken that confirms the site comprises in part mature trees and also self-sown areas of woodland that would be retained where they represent an important amenity feature and/or can assist in achieving a mature landscape setting within the housing development.
- 6.5 Contamination – Following consultation with EFDC Environmental Health, a contamination strategy has been developed for the site. Overall from the numerous phases of investigation and assessment it is considered that the site would be suitable for its proposed residential, care home, and public open space subject to the remediation proposals.

5.34 The site was not progressed to Stage 3 of the Site Selection Report 2016 as it was judged to be a less favourable growth direction. It is likely this is still the case in the Site Selection Report 2017 given the Council's preferred spatial options for Chigwell. However we do not agree with this approach.

5.35 It is considered that the site is suitable for development and meets the objectives of the Local Plan in terms of the development in sustainable locations, the types of development needed and the quality of development it is seeking to bring forward. It can also be released from the Green Belt with relatively low harm. The site is available to come forward within the Plan period, can contribute within the first five years and should therefore be allocated for development.

6. OTHER RELEVANT POLICIES

Chapter 1 – Introduction and Setting the Scene and Chapter 2 – Strategic Context and Policies

6.1 There are a number of points that are supported in chapter 1 and chapter 2, but it is not considered this has been reflected throughout the Local Plan document in terms of the housing requirement, and allocations in Chigwell. This includes:

- The Council accept that housing affordability in the District has been a significant problem in more recent times.
- Key issues to address include: to manage and accommodate the needs of the current and future population; there is very little land remaining in the District within the settlements that is not already development, and a District-wide review of the Green Belt has been undertaken to identify the potential for future development; and the need to ensure that a housing stock that matches the needs of the population, including catering for an ageing population and more single person households.
- Vision and objectives refer to new homes of an appropriate mix of sizes, types and tenures to meet local needs; and development needs will be met in the most sustainable locations.

Policy SP 3 Place Shaping

6.2 Land at Hill House, Chigwell would meet the requirements of this policy. Care would be required by the Council to ensure this policy is not overly restrictive to development coming forward.

Policy SP 7 The Natural Environment, Landscape Character and Green and Blue Infrastructure

6.3 It is recognised this policy seeks to enhance the natural environment, landscape and green infrastructure. Land at Hill House will enhance the quality of the site, and will result in enhancement to biodiversity, and open space.

Policy H1 Housing Mix and Accommodation

6.4 This policy sets out there is a need to ensure a range of house types and sizes. However it is not clear this is reflected in the proposed allocations, particularly in Chigwell.

6.5 Land at Hill House would contribute to achieving a mixed and balanced community, without over concentration on a single housing type or specialised accommodation.

Policy H2 Affordable Housing

6.6 It is recognised the need for affordable housing, and the land at Hill House will seek to meet the 40% requirement. However there is concern with the current proposed allocations, as identified, do not meet the threshold or make no contribution to onsite provision.

Policy T1 Sustainable Transport Choices

- 6.7 The land at Hill House is well located to promote transport choice, and minimise the need to travel. It would promote opportunities for sustainable transport, and access to services.

Development Management Policies

- 6.8 The site at Hill House, Chigwell would meet the relevant development management policies. This includes:

- Policy DM1 Habitat Protection - net biodiversity gain and appropriate mitigation
- Policy Dm3 Landscape character, ancient landscapes and geodiversity – proposals will not cause significant harm to the landscape, sensitive to their setting and its local distinctiveness and characteristics
- DM 5 Green and Blue Infrastructure – density to enhance green infrastructure, retention and protection of trees
- Policy DM 6 Designated and Undesignated Open Spaces – provision of open space
- DM 9 High Quality Design – contribute to the character and amenity of the local area
- DM 10 Housing Design and Quality – minimum space standards
- DM 21 Local Environmental Impacts, Pollution and Land Contamination - contamination or land instability, require these to be properly and fully addressed through remediation. The Council will expect the remediation of contaminated land through development.

7. CONCLUSION

- 7.1 The following representations have been prepared by Boyer on behalf of our client, Meridian Hill (Chigwell) Ltd, in respect of the Epping Forest District Local Plan Submission Version Document 2017. Our client is promoting the former landfill site at Hill House Farm in Chigwell for proposed development consists of c100 dwellings, provision of a Care Home, and public open space.
- 7.2 Concerns are raised in relation to the consultation timescales, and also that Regulations require that the Plan must be published in full in order for meaningful representations to be made and we understand this should include other supporting documents. The Site Selection Report Appendices 2017 were not available for consideration during the consultation. As a key part of the evidence base/supporting documents for people to consider and review as part of the Local Plan, it is impossible to determine whether the plan meets the tests of soundness set out in the NPPF.
- 7.3 Overall, it is considered the EFDC Local Plan Submission Version does not meet the tests of soundness in Paragraph 182 of the NPPF, and additional sites should be allocated for development over the plan period.

Policy SP2

- 7.4 As per the previous Local Plan consultation, policy SP2 continues to identify a minimum housing requirement of 11,400 new homes. This is informed by the SHMA 2015 and additional OAHN Updates. It is not considered the housing requirement identified is sound for a number of reasons.
- 7.5 Overall, there continue to be serious concerns that the Local plan would not make sufficient provision for housing to meet need and insufficient supply coming forward until the later stages of the plan period. If the Council cannot demonstrate that there will be a five year supply at the point of adoption the Plan will be found unsound. Additional sites are needed which will enable the Council to demonstrate a five year supply and finer grain approach to the Green Belt is necessary to determine additional sites within the administrative boundary.
- 7.6 The policy does not meet the test of soundness, set out in NPPF para 182:
- The plan is not considered to be positively prepared in seeking to meet the objectively assessed development requirements.
 - The housing requirement identified is not effective or justified by the evidence base, which indicates a higher housing requirement is necessary and additional sites are necessary.
 - The policy is not consistent with national planning policy, and there is some concern over the Duty to Co-operate in the Council seeking assistance from neighbouring authorities in terms of the unmet OANH and backlog.

Green Belt

- 7.7 In relation to the Green Belt it is recognised that the Council is pursuing a strategy which seeks to minimise the use of Green Belt land for development, whilst focusing development in the most sustainable locations. However, it is considered 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.
- 7.8 The NPPF requires planning authorities to satisfy themselves that green belt boundaries will not need to be altered at the end of the plan period (para. 85). Any potential shortfall cannot therefore be addressed by way of a partial review. If there is likely to be a shortfall, sufficient land and/or safeguarded sites should be identified at this stage. Epping Forest should review their Green Belt Review document and adopt a finer grained approach. This would provide differentiation in the smaller parcels and would enable the Council to release smaller parcels of land from the Green Belt, whilst ensuring an overall low harm, in accordance with National Planning Policy.

Policy P7

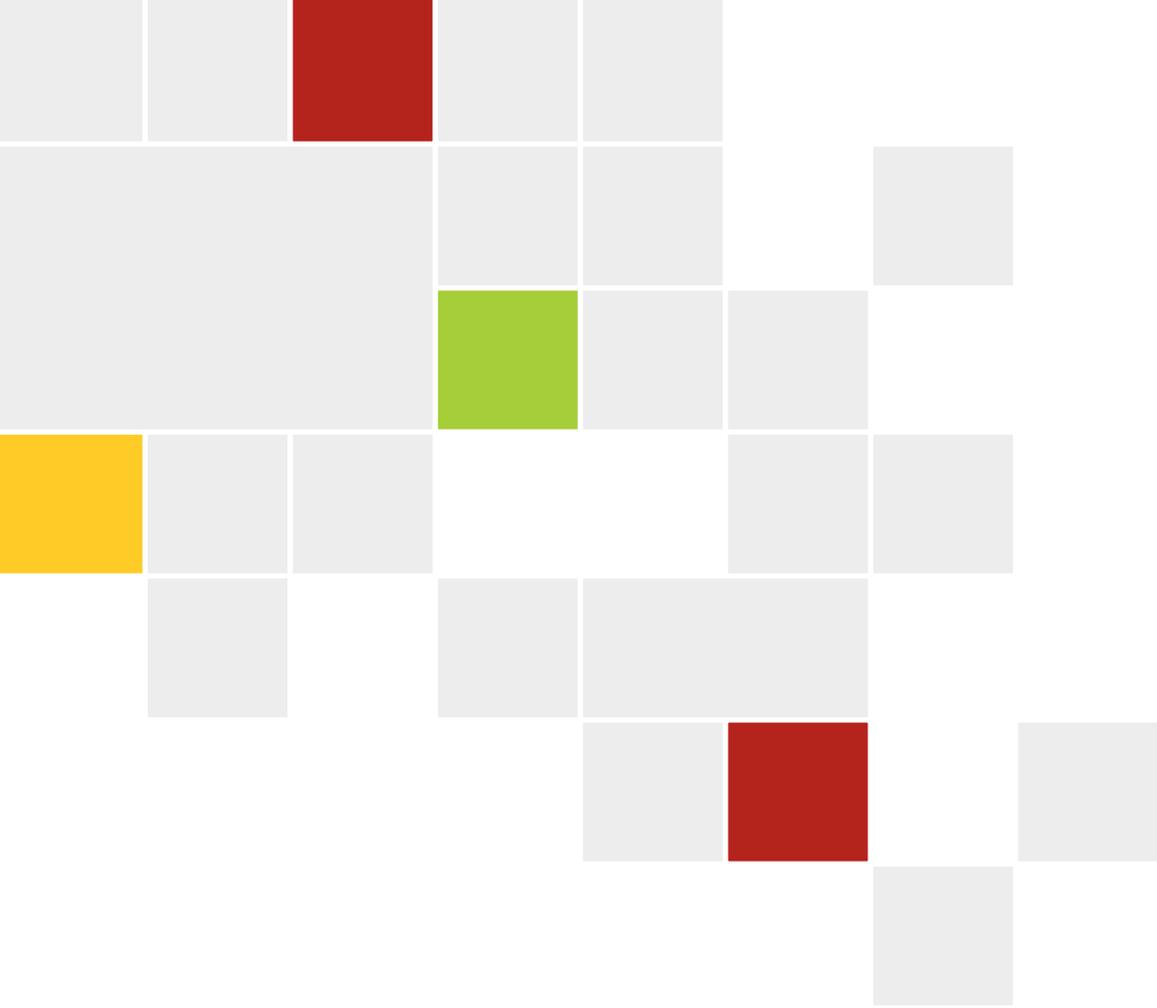
- 7.9 Policy P7 Chigwell allocates a number of sites to deliver 376 units. However we consider that Chigwell is a sustainable location that could accommodate additional units and therefore it should have been considered for additional growth. It is not considered the spatial options in Chigwell are justified, and a further review, with a finer grain approach, of the Green Belt is necessary.
- 7.10 Furthermore there is concern that the proposed allocations are not justified or positively prepared. It has not been possible to review these against the full evidence base due to the Site Selection Report Appendices 2017. There is also concern that the allocations would not be consistent with national policy, with other more sustainable sites available that could also make more of a contribution to infrastructure requirements, and achieving a mixed and sustainable community.
- 7.11 As such it is considered Policy P7 does not accord with the NPPF para 182, and is therefore unsound.

Land at Hill House, Chigwell

- 7.12 Land at Hill House, Chigwell is considered a suitable site for development to come forward in a sustainable location. It is considered that the site is suitable for development and meets the objectives of the Local Plan in terms of the development in sustainable locations, the types of development needed and the quality of development it is seeking to bring forward. The site is available to come forward within the Plan period, can contribute within the first five years and should therefore be allocated for development.

Participation at Examination

- 7.13 We wish to participate at the hearings to ensure the Inspector fully understands the concerns raised, and that these matters are addressed to ensure the Plan is sound.



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