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Dear Sirs

**EPHING FOREST DISTRICT DRAFT LOCAL PLAN SUBMISSION VERSION 2017
LAND NORTH OF LAMBOURNE ROAD, CHIGWELL ROW (REF. SR-0244)**

We write in response to the consultation currently being held by Epping Forest District Council (EFDC) in relation to the Draft Local Plan Submission Version (2017). The emerging Local Plan will establish strategic policies to guide development in the District, supported by themed district wide policies, development management policies and place specific policies and site allocations. We write on behalf of our client, the Trust for London ("The Trust") in relation to the above site.

As a general comment, we note that the National Planning Policy Framework (NPPF) requires all Local Plans to be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how this presumption should be applied at the local level.

The NPPF states that local planning authorities should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change. They should be consistent with the principles and policies of the NPPF and should be aspirational but realistic.

Paragraph 158 of the NPPF requires the use of a proportionate evidence base which provides adequate, up-to-date and relevant evidence about the economic, social, and environmental characteristics and prospects of the area. Paragraph 173 requires careful consideration of viability and costs. Plans should be deliverable and the scale of development identified in the Plan should not be subject to such obligations and policy burdens that their ability to be developed viably is threatened.

In responding to the Council's current Regulation 19 consultation, we have also made reference to the guidance set out in paragraph 182 of the NPPF, which requires Local Plans to be sound. To meet this requirement they should be:

- **Positively Prepared** – be based on objectively assessed development requirements, consistent with achieving sustainable development.
- **Justified** – be the most appropriate strategy based on proportionate evidence.
- **Effective** – be deliverable over its period and based on effective joint working.
- **Consistent with National Policy** – enable the delivery of sustainable development in accordance with the policies of the NPPF.

The following representations have been prepared with regard to these criteria and we set out below our comments on the soundness of the Draft Local Plan Submission Version (2017), taking into account its compliance with national planning policy.

The Site

The site is located within Chigwell Row, to the north of Lambourne Road. The site comprises relatively open land with areas of trees and a frontage onto Lambourne Road and is currently used as the Girlguiding Chigwell Row Campsite and Activity Centre.

To the immediate north and west of the site are scattered two storey and single storey buildings, as well as an area of hardstanding, associated with the Girlguiding Chigwell Row Campsite and Activity Centre. To the east of the site are residential dwellings located within Coopers Close and Faversham Close and to the west are residential dwellings located within Whitehall Close.

Further north of the site is land within the same ownership and used as part of the camping ground.

To the south of the site, is a Grade II listed farmhouse, Woodlands Farmhouse. In addition, the Post Office located to the west of the site is also Grade II listed.

It is understood that there are a number of TPOs on the site. The site is in Flood Zone 1 and is designated as the Green Belt. It is not in a Conservation Area.

In 2012, the site was put forward by the landowner to EFDC for residential development. Following this, the site was put forward by The Trust as part of the Council's Call for Sites exercise in 2016.

In addition, representations were made by Savills on behalf of the Trust in December 2016 to the Regulation 18 consultation to promote the site for around 80 dwellings. Representations have also been made to the draft Neighbourhood Plan.

The Trust for London

The Trust for London is a charitable organisation which seeks to reduce poverty and inequality in London and the surrounding areas. The Trust takes an interest in housing and works to tackle the housing crisis partly through investing in alternative housing solutions. Further details about The Trust, its work and its intentions for the development of the site are set out within the enclosed note.

The Trust met with EFDC Officers on 18 November 2016 to discuss the assessment of the site as part of the Site Selection process. Whilst the site was considered potentially suitable for allocation, the site falls within a category which was not taken forward for further testing beyond Stage 2 of the process; Greenfield land of greater value to the Green Belt. The Trust has also met with the Parish Council as part of the preparation of the Neighbourhood Plan.

The Trust is keen to work with EFDC to deliver dwellings on the site for social benefit, to deliver genuinely affordable housing and would also consider delivering other social infrastructure such as a community building. The Trust as landlord of the development will forego returns from the use of the land, which would reduce the cost to residents of at least 35%, which is likely to increase over time. The affordable nature of the development would be maintained in perpetuity.

Representations

The draft Local Plan does not include the site for residential development and to date officers have not engaged with the Trust about the proposed development. Conversely attempts to engage with officers have been refused.

The allocations for Chigwell have failed to take account of sites that are suitable and deliverable for residential development. The allocation of Limes Farm (Site Ref. CHIG.R6) is highly contentious. Through this allocation, the Council are seeking to remove valuable green space from the community, which will adversely impact on the existing residents of Chigwell and is opposed by a significant number of residents. It is recommended that this allocation is removed from the Plan.

The Lambourne Road site is contiguous with the settlement boundary and falls between two established residential parcels. The proposed residential development, that can be delivered alongside a community use, will not extend the settlement boundary beyond these parcels and as such will not significantly encroach on the Green Belt or lead to any sense of coalescence between settlements. Spatially residential development here is acceptable.

The site remains available for development and is deliverable and therefore there are no reasons not to allocate the site for residential development in the Local Plan.

The process that has been undertaken to progress the Local Plan is flawed. The consultation has started before all the evidence base is ready and officers have stated that not all the evidence base has been completed. As such the Plan is not legally compliant as it has not been undertaken in line with the NPPF and guidance.

This is in an attempt to get the Plan submitted in advance of the 31st March deadline (for the standardised methodology), however, the Government has advised that this will not happen until the Summer 2018. Consequently it is recommended that the Council review the allocations for Chigwell and carry out another Regulation 18 consultation with a full evidence base in advance of submitting the Plan for examination.

With the imminent change to the assessment of housing need and the subsequent increase in housing need in EFDC to in excess of 900, the site will help to meet the identified through the delivery of a site that is available for development now with no significant constraints on delivery. Moreover, this site will meet the needs of the local community, included rented housing, meeting the need in EFDC.

Summary

The consultation and engagement process for the Draft Local Plan Submission Version (2017) is flawed and it is considered that both Members of the Council and the public have not been provided with the information necessary to properly consider the Plan and in light of the missing evidence base, the Plan is not sound.

It is considered that the Plan should not proceed to examination until the full evidence base has been consulted on and landowners/representatives have been engaged by Officers to resolve concerns over sites. Should the examination proceed, we reserve the right to appear at the Examination in Public should we wish to.

We look forward to confirmation of receipt of these representations. Please feel free to contact me if you have any queries or would like to discuss.

Yours sincerely

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Catherine Williams
Associate Director