

account of up to date information on all sites. In particular we have identified a number of inaccuracies as part of the assessment stages 6.2 and 6.3 which discounted the site at Hill House, Chigwell from further consideration. Full details on this are set out in relation to the detailed comments on Appendix B.

Appendix B Assessment of Residential Sites

B1.1 Overview of Assessment of Residential Sites

The site is identified as SR-0037 'Land off Chigwell Road', and it was considered at Stage 1 and Stage 2, but did not proceed to Stage 3. The justification recognises that the site was reconsidered as it was potentially able to contribute to the Council's five year housing land supply, however it sets out that it scores poorly against several criteria including BAP habitats, Green Belt and Contamination. It did not proceed to stage 3, as it was considered the benefit did not override the constraints.

We do not agree with this conclusion, and the assessment fails to consider the previous representations submitted with the site. 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. Given the very restrictive and blunt application of the spatial options, it also prevented more suitable sites for development, such as Hill House, Chigwell to be considered for allocation.

B1.2.3 Representations received to the Draft Local Plan consultation

Representations were submitted by Meridian Hill (Chigwell) Ltd to the Draft Local Plan consultation in 2016 in relation to the site. We note these representations are summarised in appendix B1.2.3, and the site is referred to beside Stakeholder ID 2206. Reference is made that representations were submitted by the site promoter requesting that the site is reassessed in light of on-site open space proposals. However the summary does not reflect the representations submitted. As part of the 2016 representations we highlighted a number of inaccuracies in the Site Assessment, whilst also providing more information on the development proposals for the site. Therefore we are concerned the previous representations have not been fully taken into account.

B1.3 Results of Stage 1 and Stage 6.1 Assessment for Residential Sites in Chigwell

We agree with the Stage 1 result in that the site is not subject to any major policy constraints.

B.1.4.2 Results of Stage 2 and Stage 6.2 Assessment

The site at Hill House is identified as site reference SR-0037 'Land off Chigwell Road, Chigwell'. As mentioned, the Site Suitability Assessment does not take into account the previous representations for the site, and in relation to the summary of the site we highlight the following:

- Site notes: Whilst the site has been subject to some restoration, there are no planning conditions attached to the former landfill operation, and therefore the site is not a fully restored former landfill site as stated.

- Baseline yield: the number of proposed units indicated are 366 on the assumption of 30dph, however it has been identified on a number of occasions as part of representations that it is not envisaged the whole site would be developed. Following further work requested by the Council in relation to the extent of landfill, a development envelope of approximately 3.4 ha has been identified to accommodate approximately 100 new homes and a Care Home, along with 11.3 ha of public open space. The majority of the site (11.3ha) would be restored for public open space use and landscaping. We note other sites have been updated to reflect previous representations, and it is not clear why this hasn't been reflected in the assessment for the site at Hill House, Chigwell.

Furthermore, we also consider the site assessment continues to be incorrect against a number of the assessment criteria. We have reviewed the criteria against the detailed methodology for each and we have identified the following scoring corrections required:

- 1.5 Impact on BAP Priority Species or Habitats – It is not clear how it has been determined that any impacts would not be mitigable. Phase 1 and Phase 2 Ecology Surveys and Assessments have been undertaken for site, and were submitted with the Representations in January 2018. The surveys confirm that all impacts upon specific habitats, designated sites, and protected species can be mitigated. Given the extent of the open space and landscaping (11.3 ha), significant ecological enhancements would arise from the development. Therefore the score should be amended to “(+) *Features and species in the site are retained and there are opportunities to enhance existing features.*”
- 1.8b impact on archaeology – the site has been subject of extensive excavation and subsequent landfilling. Given the previous use of the site it is not clear how it has been assessed as having potential for high quality archaeological assets. The site should therefore be “(+) *there is a low likelihood that further archaeological assets would be discovered on the site*”
- 1.9 impact on air quality – the assessment refers that the site is very close to the M11 and therefore mitigation measures are likely to be required. However, the northern part of the site will be open space. The nearest dwelling proposed is over 200m from the motorway and therefore outside the buffer zone as per the detailed methodology for assessment of this criteria. The site is therefore “O – *Site lies outside of areas identified as being at risk of poor air quality*”.
- 2.1 level of harm to the green belt – It is noted the methodology for this criteria relies on the Green Belt Review completed and where a site falls entirely within one Green Belt parcel, the assessment applies the level of harm to the Green Belt attributed to that parcel. However it is not considered this is applicable in this case, as the site forms a smaller part of the parcel than that assessed as part of the Green Belt. It therefore may not have the same level of contribution as the wider area assessed. Such is the case for the site at Hill House, Chigwell Road.

Further details are set out in the submitted representations, Section 3, and outlines that a finer grained approach is required. 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. A Critique of the Green Belt Review Stage One and Two has been undertaken and submitted with our Representations. In summary this finds 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 the purposes than others. It is considered that the Stage Two Parcel 036.3 is one such parcel, of which the site is located within. It still contained a number of disparate land used with varying characteristics and different effects on delivery of the Green Belt purposes. The Critique assessed the role that the site at Hill House plays in contribution to the Green Belt function. This found that were the site released from the Green Belt, there would be overall Low harm to the Green Belt purposes. It is therefore considered the site should be “(-) *Site is within Green Belt, where the level of harm caused by release if the land for development would be very low, low or medium*”

- 3.2 Distance to nearest bus stop – the assessment for this only utilises data available to Ringway Jacobs and excluded some London bus routes, or bus routes that don't have an hourly service. However there is a bus stop at Love Lane within 400m of the site, which provides a frequent bus service W14. There is also a bus stop for the nearby school adjacent to the site. It is therefore considered the site should be scored (+), positively.
- 4.1 Brownfield and greenfield Land – the assessment does not take into account the previous landfill use was not fully restored and that there are no obligations to restore the site further. The previous use of the site should therefore be scored (+) positively.
- 4.2 Impact on Agricultural land – the site has been landfilled. It is not best and most versatile agricultural land, and therefore this should be scored (+) positively.
- 5.2 settlement character sensitivity – reference is made that the proposals are for higher density development than neighbouring developments. However this is not the case as the majority of the site is not proposed for development, and the form of development proposed is in keeping with the character of the surrounding area. It should therefore be scored “(+) *Development may improve settlement character through redevelopment of a run-down site or improvement in townscape*”.
- 6.1 Topography constraints – the methodology for this criteria assesses the gradient of sites. This is considered too restrictive, and it is demonstrated through the supporting documents submitted with the representations, that there are no constraints that preclude development. The site should therefore be scored “(-) *topographical constraints exist in the site but potential for mitigation*”.
- 6.2a Distance to gas and oil pipelines – it is recognised there is a pipeline through the northern part of the site, however development would be excluded from this area and therefore it should be “O *Gas or oil pipelines do not pose any constraint*”.

- **6.3 Impact on Tree Preservation Order** – This has been previously addressed, and is also confirmed as part of the recent Representations. An Arboricultural Impact Assessment has been completed for the site (Representations Appendix 7) and whilst there is a TPO on site, this would not severely limit feasibility for development. The tree survey 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. 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. Therefore this should be scored “*O - the intensity of the site development would not be constrained by the presence of protected trees either on or adjacent to the site.*”
- **6.5 Contamination constraints** – it is noted reference is made to reports previously submitted as part of a pre-application enquiry and that these do not demonstrate that the site can be safely developed. However, this is not the case and updates on this have been provided as part of the previous representations and also relayed to the EFDC Environmental Health. Further details have also been submitted in January 2018 as part of the Representations including a detailed contamination investigation and remediation strategy.

In summary 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 uses subject to the remediation proposals. Full details are set out in Section 5 and appendix 4 of the submitted representations, and we have contacted the Environmental Health to discuss further. The site should therefore be scored “*(-) potential contamination on site, which could be mitigated*”.

Overall it is clear that, using the Site Selection Report Methodology and the accurate information for the site, the site scores very positively against the criteria, and it does not score poorly in relation to BAP impacts, Green Belt or Contamination. This is demonstrated in the table below, which updates the relevant criteria to the corrected score.

Table 1: Updated Criteria and Results of Stage 2 and Stage 6.2 Assessment

Stage 3 and 6.2 Assessment Criteria	Site Selection Report Score	Updated Score
1.5 Impact on BAP Priority Species or Habitats	(--)	(+)
1.8b Impact on archaeology	(-)	(+)
1.9 Impact on air quality	(-)	0

2.1 Level of harm to the green belt	(--)	(-)
3.2 Distance to nearest bus stop	0	(+)
4.1 Brownfield and greenfield Land	(-)	(+)
4.2 Impact on Agricultural land	(--)	(+)
5.2 Settlement character sensitivity	(-)	(+)
6.1 Topography constraints	(--)	(-)
6.2a Distance to gas and oil pipelines	(-)	0
6.3 Impact on Tree Preservation Order	(--)	0
6.5 Contamination constraints	(--)	(-)

B.1.5.2 Results of Identifying Sites for Further Testing

This appendix sets out the site does not proceed for further testing based on the strategic options for growth and also that it scores poorly against a number of criteria. However, as discussed we do not agree with omitting the site on the basis that it falls within a strategic option which was considered to be less suitable. As set out in our submitted Representations, the Western Expansion Spatial Option for Chigwell 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 the Representations, Section 3 and Appendix 3, that additional land can be released from the Green Belt, and there would be overall Low harm to the Green Belt purposes.

Additionally, the Sustainability Appraisal also sets out that the strategic option is less sensitive to change in landscape terms when 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. Other options for growth in Chigwell are more sensitive to change in landscape terms, and are in less sustainable locations.

Furthermore, as identified above, the site is not considered to score poorly against BAP Habitats, Green Belt harm, agricultural, air quality, bus stop settlement sensitivity, distance to gas and pipe lines, and contamination. A consistent approach has not been applied, with other sites progressed despite scoring poorly against several criteria. In particular for these sites despite scoring poorly in terms of Green Belt harm, it recognised that a defensible boundary to the Green Belt would need to be created and similar assumption could be applied to the site at Chigwell Road.

B1.6.4 Results of Stage 3/6.3 Capacity and Stage 4/6.4 Deliverability Assessment

Whilst the site did not progress to Stage 3/6.3 and Stage 4/6.4, we have applied the detailed methodology (Appendix B1.6.2) for the Availability and Achievability Assessment of this stage, as set out in the table below. This clearly demonstrates the availability and the deliverability of the site to come forward for development, and the Hill House site scores better than other sites assessed

within Chigwell. The site capacity for the proposed development has also been confirmed as part of the submitted representations and supporting documents.

Table 2: Land at Hill House, Chigwell Deliverability Assessment Stage 4 / 6.4

Criteria	Potential Score	Potential Score Comments
1.1 Site ownership	(+)	The site is in single ownership.
1.2 Existing uses	(+)	There are no existing uses on site or existing uses could cease in less than two years.
1.3 On-site restrictions	(+)	The site is not subject to any known restrictions.
1.4 Availability	(+)	The site is expected to be available between 2016 and 2020.
2.1 Marketability	(+)	The site is under option to a developer.
2.2 Site viability	(+)	No viability issues identified.
2.3 On-site physical and infrastructure constraints	0	Constraints have been identified but mitigation or design solutions mean that there would be no impact upon delivery.
2.4a Primary Schools (Planning Area)	0	No change from other Chigwell sites assessed in close proximity.
2.4b Primary Schools (Individual)	(-)	No change from other Chigwell sites assessed in close proximity.
2.5a Secondary Schools (Planning Area)	0	No change from other Chigwell sites assessed in close proximity.
2.5b Secondary Schools (Individual)	(-)	No change from other Chigwell sites assessed in close proximity.
2.6 Access to open space	(+)	Proposals for new on-site open space provision as part of the development.
2.7 Health	(-)	No change from other Chigwell sites assessed in close proximity.
2.8 Impact on Minerals Deposits	(+)	None of the site is located within a minerals safeguarding area.
3.1 Impact on open space	(+)	No open space is lost as a result of the proposed allocations in the settlement. The site offers the potential for significant (11.3 ha) new open space.
3.2 Impact on primary	0	No change from other Chigwell sites assessed in close

schools		proximity.
3.3 Impact on secondary schools	0	No change from other Chigwell sites assessed in close proximity.
3.4 Impact on Green Infrastructure (GI)	(+)	The proposal provides an opportunity to enhance Green Infrastructure.
3.5 Impact on Sewage Treatment	(+)	No change from other Chigwell sites assessed in close proximity.
3.6 Impact on Central Line Capacity	(+)	No change from other Chigwell sites assessed in close proximity.
3.7 Impact on Water Network	(-)	No change from other Chigwell sites assessed in close proximity.
3.8 Impact on Wastewater Network	(+)	No change from other Chigwell sites assessed in close proximity.

Conclusion

Overall on review of the Site Selection Report and Appendices, the view from our Representations remains unchanged. It is considered the Draft Local Plan Submission Version and the evidence base are unsound.

Previous representations submitted have not been properly appraised or taken into account as part of the Site Selection Report, and there continues to be a number of inaccuracies, and an inconsistent approach applied across all sites. Furthermore, there has been a too restrictive approach applied to the site assessment, and a finer grained assessment is required. It has been demonstrated there are other more sustainable sites, such as land at Hill House, which are available and could also make more of a contribution to infrastructure requirements, and achieving a mixed and sustainable community.

It is demonstrated above, and as part of the full Representations, that the land at Hill House, Chigwell is considered a suitable, available and deliverable site for development to come forward in a sustainable location. It is considered that the site is available for delivery within the first five years of the Plan period helping to meet acute housing needs, and there are no identified constraints or restrictions which would impact upon delivery.

Yours sincerely,



Kate Kerrigan
Principal Planner

Tel: 01206 769018

Email: katekerrigan@boyerplanning.co.uk