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Your ref: SR-0970
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Planning Policy Team
Neighbourhoods Directorate
Epping Forest District Council
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CM16 4BZ

BY EMAIL ONLY

23rd April 2018

Dear Sir/Madam,

EPPING FOREST DISTRICT LOCAL PLAN SUBMISSION VERSION 2017

SUPPLEMENTARY CONSULTATION REPRESENTATIONS

LAND EAST OF SEWARDSTONE ROAD, NEAR CHINGFORD: SITE REF SR-0970

We write to you on behalf of our client, the Wardens and Scholars of Winchester College, to supplement our previous representations submitted to Epping Forest District Council (EFDC) in January 2018. These representations consider the finalised version of the Site Selection Report and its associated Appendices. The submission relates to 'Land East of Sewardstone Road, Chingford' ("the Site"), with a reference of 'SR-0970' in the Draft Local Plan documentation.

BACKGROUND

The Site was promoted through the Council's Call for Sites on 12th December 2016, which ran alongside the Regulation 18 Consultation on the Draft Local Plan, for residential development. The Site was put forward for consideration given its medium to long term potential for residential development, assuming the Council was able to meet its housing target and identify a five year housing land supply. However, we concluded in our submission that if the Council was not able to meet its housing target or identify a five year housing land supply, or if other proposed allocations within the Draft Local Plan were to fall away, the Site could come forward at an earlier date.

The Site is considered to be suitable, developable and can provide housing to meet the growing need for London, whilst assisting with the Council's aim of distributing allocated sites around the District.

In January 2018, we submitted representations to the Council in response to the Site's omission as an allocation in the Submission Version of the Local Plan. Whilst we noted that the Local Plan Submission Version allocated sufficient land for the Council to meet its housing target and identify a five year housing land supply (based on the previously defined OAN), we were disappointed to find that there was no evidence accompanying the submission version which set out why the Site had been discounted. At that time, Appendix B of the Site Selection Report was not available – the Council's assessment of residential sites.

Having now reviewed the Site Selection Report, we note that the Council has considered that as the Site is located outside, but near to a less suitable strategic option, the constraints identified for that strategic option are considered to apply to the Site. The Council's assessment is therefore strategic and we note, includes a number of inaccuracies. In such circumstances, we believe that this particular site should be re-assessed on its individual merits.

The following representations should be read in conjunction with those submitted in January 2018 and seek to outline the reasons why we oppose the omission of the Site from the submission version of the Local Plan.

KEY CONSIDERATIONS

Preparation of Appendices

There is concern regarding the methodology that was adopted to confirm allocations as part of the Site Selection Assessment in relation to Appendix B. Whilst Appendices B and C were not available at the time of the publication of the Site Selection Report in December 2017, the Council have stated that Appendix B (along with the other appendices to the report) has not been amended. It is therefore unclear as to why Appendix B1.4.2 'Results of Stage 2' and Appendix B1.6.4 'Results of Capacity and Deliverability Assessments' are both dated March 2018. This would imply that Stages 2 and 3 were both undertaken after the publication date of the Site Selection Report in December 2017 which presents the results, and would therefore appear to represent post rationalisation.

Critique of Appendix B1.5.2 (Results of Identifying Sites for Further Testing)

We note that the 'Less suitable strategic option' contains a small proportion (the road frontage) of the Site which was put forward on behalf of our client. The Council's justification that the settlement was unsuitable states:

"This strategic option would lead to the promotion of further unsustainable patterns of growth, which would increase the current pattern of ribbon development and focus development where there are limited public transport services and away from existing community facilities and local amenities and shops. The strategic option would also be harmful to the Green Belt; this is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area would have a very high impact upon the Green Belt. The strategic option straddles parcels 059.1 and 059.2 which both perform strongly against Purpose 1, preventing the outward sprawl of London.

This strategic option has variable sensitivity to change in landscape terms, as evidenced by the Settlement Edge Landscape Sensitivity Study (2010), which concluded that the landscape to the north of Sewardstone has low sensitivity to change, whilst land to the south is highly sensitive. Aside from small areas in the west of this strategic option, which are located within Flood Zones 2 and 3, for the most part the strategic option lies within Flood Zone 1. However, it is judged that the harm identified to Green Belt, as well as the limited access to public transport, existing community facilities and local amenities would, at the settlement level, outweigh any positive factors associated with this strategic option."

Notwithstanding the justification for the lack of suitability of the Option relating to Sewardstone, we believe that the Site remains suitable, available and deliverable. Whilst the assessment suggests that the wider strategic option would promote further unsustainable patterns of growth, we consider that this particular site should be considered on its individual merits. This is particularly relevant as some of the proposed sites within the settlement would have a far greater impact than others.

In this respect, the Site is bordered to both the north and south by horticultural uses and farm buildings, and currently forms a gap in the development along the road with existing residential development on the opposite

side. If the Site came forward it would mirror development on the opposite side of the road, within the confines of the existing linear development, and would not extend the outer limits of the existing settlement. It would not therefore represent ribbon development and should instead be considered 'infilling' or the 'rounding off' of an existing settlement. Part of the Site, namely the frontage onto the road, could be released from the Green Belt without neither having any undue adverse impact on the wider landscape nor contributing to the outward sprawl of London.

It is incumbent on the Council to maximise the opportunities available and when objectively assessed against the five purposes of the Green Belt, it is considered that this particular site could be developed without compromising the Green Belt. As such, we consider that the Site should be considered for removal from the Green Belt.

Furthermore, any development on this Site could provide appropriate community facility or local amenities to supplement those located within the existing settlement.

CONCLUSIONS

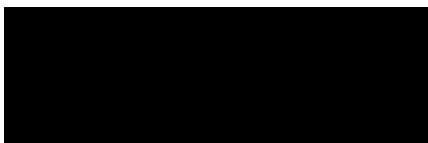
In light of the above representations, we believe that the draft Local Plan is unsound, as we are unclear as to when Stages 2 and 3 were undertaken as both are dated March 2018 which is after the publication date of the Site Selection Report (December 2017).

Furthermore, the above representations oppose the decision of Epping Forest District Council to omit the Site from the submission version of the Local Plan, as it remains suitable, available and deliverable.

We trust that the information provided above is clear, however if you require further clarity on any of the comments made please do not hesitate to contact us; we would be willing to meet with you to discuss our client's aspiration for the site, if this is deemed to be of assistance.

We would be very grateful for confirmation that these representations have been received.

Yours faithfully



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Associate

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