

16<sup>th</sup> April 2018

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**By email**

Dear Sir or Madam,

**Langston Road North, Loughton, IG10 3TY – Site Ref:SR-00325**  
**Local Plan Consultation – Missing Appendices from Local Plan Report on Site Selection (2018)**

We write on behalf of Essex County Council (Property and Facilities) who own land at Langston Road North, Loughton, which benefited from a draft allocation in the 2016 Draft Local Plan Consultation (extract attached) for employment uses, along with adjacent land. The site extends to 9.39ha, is suitable, deliverable and available, and represents a relatively substantial employment allocation within the District – only 23ha of new employment land is allocated in the latest draft plan, with 10ha of this being at North Weald Airfield, and 10ha south of Waltham Abbey.

Our clients were disappointed that this allocation was not continued into the latest Draft Plan, and that Appendix F of the EFDC Local Plan Report on Site Selection (2018) through which sites were assessed was not made available during the consultation on the Local Plan. This substantially prejudiced our client as they would not have been able to assess the reasons that their site had been discounted, or assess it against other sites.

Having had the opportunity to review why the previously proposed employment site at Langston Road North (SR-00325) was not continued into the draft Local Plan, we make the following observations:

- Appendix F1.1 (extract attached) with reference to the site states that it “... *scored poorly against several Stage 2 criteria including access to the site, impact on Ancient Woodland and BAP Priority Habitats and harm to Green Belt. It was considered that these constraints were unlikely to be overcome and the site did not proceed beyond Stage 3*”. Given the importance of provision of new employment space, especially within an area which is otherwise poorly provided for we would have appreciated the opportunity to work with EFDC, and been given the opportunity to provide comment at an early stage. Unfortunately no such opportunity has been provided.
- Appendix F1.3 (extract attached) provides further site specific detail of the assessment, with regard to the issues raised as of particular concern in Appendix F1.1:
  - Ancient Woodland – it is stated that “*The site is adjacent to Broadfield Shaw Ancient Woodland. The site may directly affect a small area of the Ancient Woodland but impacts may be mitigated against through considered masterplanning*”. It is confirmed that “*no Ancient or Veteran trees are located*”

- within the site*". Given this it seems unreasonable to discount the site based on ancient woodland.
- BAP Priority Habitats – it is stated *"The site encompasses around half of a BAP priority habitat and is adjacent to an additional BAP priority habitat. It has one species recorded within it. The site is likely to directly impact the on-site habitat and species, but this may be mitigable."* Given the size and importance of the allocation it seems unreasonable not to have undertaken more detailed survey or assessment work, or consulted with the landowner over concerns that needed to be addressed.
  - Green Belt – it is stated the *"site is within Green Belt, where the level of harm caused by release of the land would be high or very high"*. There is in our view inadequate depth of analysis and consideration. While the EFDC Green Belt Assessment: Stage 2 (2016) study concluded the wider parcel assessed would cause 'very high' harm to the Green Belt purposes if released from the Green Belt due to the 2<sup>nd</sup> Green Belt Purpose (preventing neighbouring towns merging) and 3<sup>rd</sup> Green Belt Purpose (assist in safeguarding the countryside from encroachment), assessment of site SR-00325 was much more positive. With respect to Purpose 2 it was stated *"... However, the strong woodland belt in the east of the parcel and the landform also help to visually separate the towns"*, and with respect to Purpose 3 it stated *"the southern half of the parcel could potentially contain development from the wider countryside, the parcel is visually separate from the settlement of Loughton and therefore development may be perceived as encroachment"*. Given that most new employment sites will be in the Green Belt it seems unreasonable to use this as a reason for discounting the site – site specific consideration should have been given, which in the case of site SR-00325 does not appear to have happened. Also of note at Appendix F1.3 it is assessed that the *"site is located adjacent to Langston Road Industrial Estate and proposed for employment use. Development is not likely to affect the character of the area"*.

On behalf of Essex County Council (Property and Facilities) we wish to express concern that the site selection process does not take full opportunity of sites available for employment development, and may be open to criticism with respect to whether the plan is sound. In our view the site selection process is not supported by an adequate evidence base, and sites have not been selected in an objective manner. There appear to be a number of significant inconsistencies in approach.

We would welcome the opportunity to further discuss why the site at Langston Road North was not continued into the latest plan, and would appreciate the opportunity to appear at the Local Plan Inquiry.

I would be grateful if you are able to keep me informed of progress of the Local Plan.

If I can provide further details, please do not hesitate to contact me.

Kind regards.

Yours faithfully,

  
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