

## Epping Forest District Council Representations to the Draft Local Plan Consultation 2016 (Regulation 18)

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			St Congar Provincial

Method	Letter
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### Letter or Email Response:

Dear Sir/Madam, On behalf of our client St Congar Provincial please find attached representations to the Epping Forest Draft Local Plan Consultation 2016. I would be grateful if you could confirm receipt of this email. Kind Regards  
Land at Old Farm, Chigwell Representations to the Epping Forest District Draft Local Plan on behalf of St Congar Provincial December 2016  
Old Farm, Chigwell Representations to the Epping Forest District Draft Local Plan on behalf of St Congar Provincial December 2016  
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Appendix 1- Alternative Options Appendix 2 - Landscape Technical Note 1.0 Introduction 1.1  
These representations have been prepared by Nexus Planning, on behalf of St Congar Provincial, in response to the consultation on the Epping Forest District Draft Local Plan. St Congar Provincial control land at Old Farm, Chigwell ("the site"), located to the east of Vicarage Lane. The site boundary is shown below: Figure 1. Land at Old Farm, Chigwell site boundary 1.2 The following representations provide comments on the Draft Local Plan as a whole and the supporting evidence base, highlighting a range of fundamental concerns. Specific commentary is also provided on the merits of including land at Old Farm, Chigwell as a housing allocation within the Draft Local Plan. 2.0  
General Comments on the Draft Local Plan Paragraph 3.54 - Housing Site Selection Process 2.1 Paragraph 3.54 of the Draft Local Plan sets out the Council's approach to the allocation of sites for housing across the District and St Congar Provincial has fundamental concerns with the approach that has been adopted to date. 2.2 It is noted that seven different criteria have been used in order to determine site allocations, however, no reference is made to the sustainability credentials of the settlement where development is proposed i.e. focusing development in areas with the best access to services and facilities. This is further evidence by the spatial strategy advocated by the Draft Local Plan. Such an approach fails to achieve sustainable patterns of growth, contrary to the fundamental principle of the National Planning Policy Framework ("NPPF"). 2.3 One of the seven site selection criteria is sites located on open space within settlements where such selection would maintain adequate open space provision within the settlement. This is afforded a high priority by the Council, being third out of seven options. For the reasons set out later on in these representations, it is considered that such an approach is fundamentally flawed, short sighted and

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would inevitably result in the long term and irrevocable degradation of the District's urban areas. Figure 3.5 - Housing Requirement and Allocations

2.4 Figure 3.5 states that the Draft Local Plan includes reserve sites to ensure that the Local Plan includes sufficient flexibility to adapt to rapid change. Appendix 5 of the Draft Local Plan then identifies that some 12,784 dwellings will be delivered over the Plan period. Notwithstanding St Congar Provincial's objections to the proposed housing requirement, which is demonstrably too low, it does support a buffer approach to address issues such as the potential non- implementation of allocated sites, a delay in the delivery of strategic sites or a change in housing needs (for example it is noted that the 2014-based household projections show an upward trend in housing need). At present, the Council is proposing a 12% buffer but the Local Plan Expert Group report to Government (March 2016) recommends a reserve site buffer of 20% of the overall housing requirement, an approach taken in the recently adopted Stratford- on-Avon District Core Strategy.

2.5 Given the above and having particular regard to the heavy reliance upon large strategic allocations on the edge of Harlow, which may suffer delays in delivery, the Council should increase their allocations to provide greater flexibility and to improve the robustness of the housing trajectory. Land at Old Farm Chigwell represents a site that could help meet these additional housing needs in a highly sustainable location, particularly within the first five years of the Plan period.

2.6 The Council reference the use of Reserve Sites but it is not clear which sites this relates to, or indeed whether any such sites have been identified at this stage. Further clarity should therefore be provided in this regard. Paragraph 3.56

2.7 It is detailed that the Council will expect new development to maximise densities on housing sites, with further detail provided at Draft Policy SP4. Whilst St Congar Provincial support this approach in general, it is important to ensure that densities reflect the prevailing character of the area. It is accepted that this may require the allocation of additional greenfield sites, but this must be balanced against the need to preserve the prevailing character of existing built- up areas. Draft Policy SP 2: Spatial Development Strategy 2011-2033

Housing Need

2.8 The West Essex and East Hertfordshire Strategic Housing Market Assessment, September 2015 and the August 2016 Update ("SHMA") were prepared on behalf of the respective Councils by Opinion Research Services ("ORS"). Overall the SHMA (August 2016) concludes that the full objectively assessed housing needs ("FOAN") for Epping Forest is 13,278 dwellings between 2011-33 (604dpa). For the reasons set out below, St Congar Provincial is of the view that 604dpa for Epping Forest does not represent FOAN.

Population and Household Projections

2.9 The Planning Practice Guidance ("PPG") is clear (ID: 2a-015) that the household projections published by the Department for Communities and Local Government ("DCLG") should provide the starting point estimate of overall housing need; and that (ID: 2a-017) plan makers may consider sensitivity testing, specific to their local circumstance. However, any local changes need to be clearly explained and justified on the basis of established sources of robust evidence.

2.10 The demographic starting point within the SHMA is underpinned by the Office for National Statistics ("ONS") 2014-based sub-national population projections ("2014-based SNPP") and the Department for Communities and Local Government ("DCLG") 2014-based Household Projections ("2014-based HHP").

2.11 As set out within Figure 8 of the SHMA (August 2016), in accordance with the PPG, based on the latest 2014-based SNPP and HHP the starting point household change figure over the Local Plan period is 14,374 households within Epping Forest (653 households per annum). Once vacant and second homes are taken into account (based on Census 2011 data) the resulting PPG demographic starting point housing figure for Epping Forest is 15,021 dwellings (683dpa) over the Local Plan period.

2.12 There is a meaningful difference between the PPG demographic starting point housing figure and the SHMA demographic starting point housing figure for Epping Forest (a 13% reduction). The basis of the demographic starting point housing figure downward adjustments applied within the SHMA appears to be principally based on the migration trends used by the ONS.

2.13 The 2014-based SNPP's apply internal migration trends over the 5-year period between 2009/10 to 2013/14 and for international migration over the 6-year period between 2008/09 and 2013/14. Migration in these years in terms of volume and profile are reflected in the 2014-based SNPP's and the 2014-based HHP's.

2.14 The PPG is clear (ID: 2a-017) that the household projections produced by the DCLG are statistically robust and are based on nationally consistent assumptions. As previously referred, whilst adjustments to these projections can be made, any adjustments should relate to local circumstances.

2.15 It appears that the housing assessment methodology default applied by ORS within all housing assessments it undertakes is the use of 10-year migration trends. The approach is applied without any regard, as required by the PPG, to whether long-term migration adjustments to the nationally consistent projections is justified based on local circumstances.

2.16 No evidence is presented within the SHMA to demonstrate that the 5/6-year migration trends underpinning the 2014-based population projections are not likely to continue in the future i.e. have they been influenced by short term shock factors within the past five years such as the recession; a large employer moving in or out of an area; or the expansion of an education facility, for example.

2.17 Given the above, 683dpa is therefore considered to be a

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minimum figure for Epping Forest over the period covered by the Local Plan. This is considered to be a minimum demographic- based housing figure given the SHMA has also failed to correctly address household formation suppression trends between 2001 and 2011 being replicated over the SHMA (and therefore Local Plan) period. Household Formation Rates 2.18 The PPG outlines (ID-2a-017) that as part of the demographic-based starting point consideration, adjustments to the DCLG HHP household formation rates (“HFRs”) (amongst other factors) can be made in response to local circumstances. 2.19 The SHMA (September 2015) considers the 2012-based HHP HFRs within (paragraphs 3.68 to 3.75). On this matter the SHMA concludes: “The changes since 2008 were anticipated and these reflect real demographic trend, and therefore we should not adjust these further; although the extent to which housing supply may have affected the historic rate is one of the reasons that we also consider market signals when determining the OAN for housing.” (para. 3.75). 2.20 It is not accepted that the changes since 2008 were fully anticipated and the 2012- or 2014- based HRRs reflect real demographic trends that are likely to continue over the longer timeframe. It was inevitable given that between 2001 and 2011 house building in England fell to some of the lowest levels in recent (post-war) history and completions were consistently lower (around half) the level of household growth projected. 2.21 Furthermore, whilst also accepting that there are other factors such as increased higher education take-up, that may influence household formation, the recession of 2008/09 and slow and jittery economic recovery in the years that followed will have had an impact on household formation within Epping Forest and the HMA more generally. People typically have a propensity to delay significant financial commitments, such as moving house, during periods of economic uncertainty. Credit and loan availability is also restricted during recessionary periods, again acting as a potential barrier to moving home or forming new households. 2.22 The recent DCLG HHP 2012-based and 2014-based projections are therefore considered to carry forward some trend in suppressed HFR, particularly for younger age groups (the 25 to 44 aged cohort). Indeed, a central component of the Government’s housing delivery agenda to assist new housing formation for those under the age of 40 (Starter-homes). 2.23 The SHMA’s approach of addressing suppressed household formation as part of the market signals adjustment is also not accepted. The PPG is clear (ID: 2a-015) that adjustments to household formation is a demographic starting point factor and not a market signals adjustment: “The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under supply and worsening affordability of housing. The assessment will therefore need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply.” 2.24 The HFR adjustment is to take account of household projection-based factors, such as avoiding embedding recessionary trend influences, into a demographic-based starting point figure. The market signals analysis and any upward market signals adjustment is a distinctly separate section and stage within the PPG (ID: 2a-019 and 2a-020) assessment process: “The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals...” (2a-019) “A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections.” (2a-020). 2.25 The adjustment for household formation suppression needs to be made at the preliminary demographic stage when determining the household projection starting point figure. So by not doing it within the SHMA, the demographic starting point figure is too low. Had the household projection adjustment been made at the correct stage in determining FOAN, the effect would be a higher starting point figure for Epping Forest within the SHMA (August 2016), against which an appropriate market signals upward adjustment should have been made. Market Signals Adjustments 2.26 The PPG (ID: 2a-020) does not provide any guidance on what scale of uplift should be applied to the demographic starting point housing figure (with appropriate demographic adjustments). But what is clear from the PPG is that the response should lead to a shift in the balance of demand and supply such that affordability pressure might ease over time. As evidenced within the SHMA, in the context of the significant affordability issues within Epping Forest and the wider HMA the market signals uplift should reasonably be a ‘large additional supply response’. 2.27 The approach applied within the SHMA is based on a percentage uplift from the demographic starting point figure. It is accepted that this is a common approach applied by Local Plan Inspectors as part of the plan-making process. It is noted that the SHMA applies a 20% upward adjustment for all HMA authorities. 2.28 In light of the emerging Cambridge Local Plan, which applies a 30% uplift, and the Local Plan Expert Group recommendations to Government, it is considered at a 20% market signals uplift for Epping Forest and the respective HMA should be considered as a minimum. 2.29 Based on the demographic starting point housing figure outlined above (683dpa), the corresponding housing requirement with at

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least a 20% market signals adjustment would be 819dpa or 18,025 dwellings over the Plan period. Economic Adjustments 2.30 In light of the demographic deficiencies it is not possible to determine whether the response to balancing jobs and workers within the SHMA is justified i.e. no adjustment necessary. Given the demographic concerns outlined above St Congar Provincial is concerned that the SHMA has failed to properly assess, as required by the NPPF (namely paragraphs 18 to 20), the appropriate level of housing necessary to support economic growth within Epping Forest. Delivery of Housing through Neighbourhood Plans 2.31 Draft Policy SP 2 states at point A iv) that new homes will be delivered by sites identified in Neighbourhood Plans. The NPPF is clear that Green Belt boundaries can only be reviewed by Local Plans (paragraph 85) and given the constrained nature of the District with a high proportion of Green Belt and limited capacity in built-up areas, Neighbourhood Plans would have very limited opportunities to allocate new growth. 2.32 Given the above, St Congar Provincial question whether Neighbourhood Plans can, in this instance, offer a meaningful contribution towards housing delivery in Epping Forest District. Distribution of Growth 2.33 Policy SP 2 sets out the proposed allocation of growth to settlements across the District but as mentioned earlier, this appears to have limited regard to the settlement hierarchy identified later on in the Draft Local Plan. For example, key sustainable settlements such as Chigwell (defined as a Larger Village), which have historically seen very limited growth, continue to see more of the same. Importantly, this approach fails to address the one of key drivers of housing pressures in the District (commuting to London), as will be outlined in more detail later on in these representations. 2.34 Accordingly, St Congar Provincial consider that the proposed level of growth at Chigwell is demonstrably too low and should be significantly increased to better address housing pressures and affordability issues in the area. Nature of allocated sites 2.35 St Congar Provincial's concerns regarding the level of growth proposed on existing areas of open space within built-up areas has already being outlined. However, it is also noted that approximately 650 dwellings are proposed to be built on car parks across the District. Whilst it is accepted that some car parking could be retained as part of the development proposals, this overall provision is likely to reduce and a number of the car parks identified for development are located by railway/underground stations, where demand is very high. 2.36 St Congar Provincial agree that sustainable modes of transport should be encouraged, however, the commuting nature of the District is clear and accepted by the Council, which coupled with the fact the District comprises a number of smaller villages with little or no access to railway lines or frequent bus services, means the demand for parking could outstrip supply. 2.37 St Congar Provincial therefore consider that the Council should seek to protect car parks and instead allocate additional growth in sustainable greenfield locations i.e. within cycling or walking distance of railway stations or frequent bus services. Land at Old Farm, Chigwell represents such a site. Capacity of Allocated Sites 2.38 St Congar Provincial is concerned that there are number of significant shortcoming in the capacity assumptions that have been made for numerous draft allocations, both in terms of density assumptions being too high to adequately respect the existing character of the settlement and the capacity assumptions failing to account for the true developable area of sites. 2.39 Whilst St Congar Provincial has not reviewed every draft allocation in detail, it has been possible to identify such issues in only a small and random selection of sites, suggesting a more widespread issue, which must be addressed. Examples include: Site SR-0195B at North Weald Bassett is allocated for 91 dwellings. St Congar Provincial has calculated the developable area of this site to be only approximately 2.2ha, which would result in an average density of 41 dph. Such a density would be out of keeping with the low density nature of the existing village; and Site SR-0070 at Theydon Bois is allocated for 52 dwellings on approximately 0.7ha of developable land. This translates into a very high density of 74 dph, which is even higher than densities assumed in the Draft Local Plan for town centres. 2.40 Once the Council has undertaken a further thorough analysis of capacities assumed on all allocated sites, St Congar Provincial consider that the Council is highly likely to fall short of its housing requirement and will subsequently need to find a significant number of additional dwellings to meet its purported OAN. Land at Old Farm, Chigwell represents a site that could help address this shortfall. Paragraph 3.62 - Housing Trajectory and Land Supply 2.41 Paragraph 3.62 references Appendix 5, which sets out the Council's breakdown of housing land supply. 2.42 Upon review of this trajectory, it is evident that a number of errors have occurred in the calculation of the five-year housing land supply requirement. Firstly, the Council failed to take account of the current shortfall over the early years of the Plan period, which is set out below for ease of reference:

Year	Requirement	Completions	Shortfall	2011/12
175 (East of England Plan)		288	+113	175 (East of England Plan)
England Plan)	89	-86	2013/14	518 (West Essex and East Hertfordshire SHMA 2015)
Hertfordshire SHMA 2015)		299	-219	2014/15
				518 (West

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Essex and East Hertfordshire SHMA 2015)	230	-288	2015/16	
518 (West Essex and East Hertfordshire SHMA 2015)	267	-251	Total	
1,904	1,173	-731	2.43	The East of England Plan was revoked in February 2013 and therefore only sets the requirement until 2012/13, after which the West Essex and East Hertfordshire SHMA 2015 establishes the housing requirement (notwithstanding our objections that is too low). Having regard to the above, it is apparent that in each of the last four years the Council has significantly under delivered when measured against its housing target, which is considered to represent persistent under delivery and as such, a 20% buffer should be applied, having regard to paragraph 47 of the NPPF. This buffer should be applied to the shortfall (identified above) and the five-year requirement, as supported by the Local Plan Inspectors for the West Oxfordshire Local Plan and the Bromsgrove and Redditch Joint Local Plan. Even if the Council does not accept that a 20% buffer should be applied and instead the 5% buffer used, it does not appear that the identified shortfall has been fully taken into account. 2.44 In accordance with the above calculations, the Council's five-year housing requirement should be at least 3,985 dwellings (using the Council's calculation of OAN), meaning the Draft Local Plan proposes a shortfall of 444 dwellings in that period and accordingly is unsound. Land at Old Farm, Chigwell could be substantially delivered with the first five years of the Plan period and make a meaningful contribution towards this shortfall. Draft Policy SP 3: Strategic Allocations around Harlow 2.45 St Congar Provincial note that the HMA authorities are proposing to allocate significant growth on the edge of Harlow, in order to support its regeneration. Whilst St Congar Provincial do, to some degree, understand the rationale for this approach, it fails to address other housing pressures of the District and a reduced emphasis on growth around Harlow is therefore required. 2.46 The NOMIS travel to work data (2011) shows that the greatest number of residents commuting out of Epping Forest go to the City of London and other boroughs within London, as acknowledged at paragraph 2.31 of the Draft Local Plan. It is therefore clear that a significant driver for housing pressures in the area (and therefore issues of affordability) derive from a demand for housing in locations easily commutable to London. St Congar Provincial consider that this is critical consideration for the distribution of development proposed by the Draft Local Plan which has, to date, been demonstrably overlooked. 2.47 St Congar Provincial notes that Harlow experiences the majority of out-commuting to Epping Forest and East Hertfordshire and as a result, it is not seen as commuting District for London, when compared at other settlements in the HMA. 2.48 Given the above, St Congar Provincial question what evidence supports the delivery of such a significant quantum of Epping Forest District's housing needs on the edge of Harlow or indeed North Weald Bassett, the latter of which does not benefit from any railway links to London. 2.49 In adopting basic sustainability principles, and in accordance with the NPPF (paragraphs 27 and 34) the Council should be allocating a greater proportion of housing on the edge of the wider London urban area, closest to the source of demand or on desirable public transport commuter lines, both of which apply to Chigwell. Draft Policy SP 4: Place Shaping 2.50 Policy SP 4 sets out a long list of place shaping principles. Whilst St Congar Provincial support many aspects of this policy, including parts vi, vii, and vii (of Section A), the importance placed upon preserving and enhancing green infrastructure is considered to be contradictory with the Council's proposed strategy of building upon existing designated areas of open space. 2.51 In respect of Section B of Policy SP 4, which relates to residential densities, please see our response to paragraph 3.56 of the Draft Local Plan. Figure 3.8 Proposed Green Belt boundary alterations to take account of proposed allocations 2.52 Figure 3.8 shows the areas of land proposed to be removed from the Green Belt. Having regard to our earlier representations regarding the source of housing pressures, in particular the demand for housing in locations with strong commuting links to the City of London, such as Chigwell, it is apparent that there is a lack of development proposed in the southern part of District. Whilst it is noted significant development is proposed within the built up areas of Loughton and Buckhurst Hill, our fundamental concerns with this strategy (building on open space) have already being identified. 2.53 Our earlier representations comprised a Vision Document, which set out a strategy for land at Old Farm, Chigwell and included an assessment of the site against the purposes of including land within the Green Belt. It is noted within the Council's Report on Site Selection (September 2016) that the site scores a single negative i.e. where the level of harm would be very low, low or medium. 2.54 Notwithstanding the fact that sites with a greater level of harm upon the Green Belt appear to be allocated for development (such as SR-0069 Land at Ivy Chimneys Road, Epping, SR-0069/33 Land South of Epping, SR-0390 Greenstead Road and SR-0067i Land to the west of Chipping Ongar) St Congar Provisional considers that land at Old Farm, Chigwell could come also forward in smaller discrete parcels, should the Council only be minded to consider a more limited Green Belt release. Further details are set out later on in our representations. Appraisal of Green Belt Allocations 2.55 In addition to the above, St Congar Provincial has undertaken a high level review of the areas of land proposed to be removed from the

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Green Belt in the Draft Local Plan, and has fundamental concerns with the approach that has been adopted. 2.56 In undertaking this initial review, the following sites, as examples, appear to be fundamentally flawed in the approach to defining new Green Belt boundaries: ? Site SR-0132Ci at Epping; ? Site SR-0026C at Theydon Bois; and ? SR-0185 and SR-0184 at Ongar. 2.57 In every instance, it appears that the Council is proposing that new Green Belt boundaries are defined in an arbitrary manner, across open fields and having no regard to existing features. 2.58 Paragraph 85 of the NPPF clearly states that when defining Green Belt boundaries, local planning authorities should; “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent” 2.59 Furthermore, the Council’s own Green Belt Review Methodology (August 2015) defines a defensible boundary as: “A physical feature which is readily recognisable marking the limit or dividing line of an area which is likely to be permanent (Based on Oxford Dictionary online). Such features include a wall, woodland, watercourse, body of water, main roads or other significant piece of infrastructure.” 2.60 The Green Belt Assessment: Stage 2, produced by Land Use Consultants provides examples of which features should be used to define boundaries for allocations, none of which allow for the creation of a new boundary feature. It is, however, noted that paragraph 5.10 of the Green Belt Assessment states: “Should the District decide to release land from the Green Belt, we recommend that outline masterplans are prepared as part of the Local Plan process. These would indicate development areas, new defensible Green Belt boundaries (existing or new features).” 2.61 The NPPF is clear that Green Belt boundaries should be defined using physical features. It does not at any point provide scope to create new arbitrary boundaries to post justify development and doing so would likely result in substantial areas of Green Belt across the country being proposed for release. St Congar Provincial is aware that the use of existing physical features has been consistently applied across the country, including other Green Belt Assessments carried out by Land Use Consultants (such as the Joint Green Belt Study for Coventry City Council, North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council, Stratford-on-Avon District Council and Warwick District Council). 2.62 If the Council were to proceed with the aforementioned draft allocations in their current form, St Congar Provincial consider that the Draft Local Plan would be found unsound, as it is inconsistent with the NPPF. Accordingly, the Council must undertake a thorough review of the draft allocations in light of this evidence, and re-consider their appropriateness. Land at Old Farm, Chigwell is bound by physical features that are readily recognisable and likely to be permanent and should therefore be re-appraised for its inclusion in the Draft Local Plan for residential development. Paragraph 3.97 – Safeguarded Land 2.63 At paragraph 3.97 of the Draft Local Plan, it is stated that the Council is not clear at this stage the extent to which safeguarded land will be required. Paragraph 85 of the NPPF is clear that local planning authorities should identify areas of ‘safeguarded land’ in order to meet longer- term development needs stretching beyond the plan period. 2.64 It is clear that the housing needs for this plan period requires a significant quantum of land to be released from the Green Belt. It is therefore difficult to see a realistic scenario in which a review of the Local Plan or the preparation of a new Local Plan would not similarly require the release of Green Belt land to meet development needs. Furthermore, should no need arise for the safeguarded land, it would remain protected until such time that it was. Accordingly, the Council should identify areas of safeguarded land as part of this Draft Plan, with such land comprising parcels that perform weakly in Green Belt terms and are located on the edge of sustainable settlements, such as Chigwell. Whilst St Congar Provisional consider that all of Land at Old Farm, Chigwell should be allocated for development during this Plan period, revised options detailed later on in these representations do provide the Council with an opportunity to allocate some growth now, but safeguarded further land, should further housing needs arise in the future.

Draft Policy SP 6: The Natural Environment, Landscape Character and

Green Infrastructure

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2.65 St Congar Provincial considers that the Council's prioritisation of developing upon existing open space is contrary to Draft Policy SP 6 and community consultation responses identified at paragraph 3.100 of the Draft Local Plan.

2.66 Given the above, existing open space within built-up areas should be protected and further opportunities explored on the edge of sustainable settlements, such as land at Old Farm, Chigwell.

#### Draft Policy DM 2 Landscape Character and Ancient Landscapes

2.67 The Landscape Technical Note prepared by Arc Landscape Design & Planning Ltd demonstrates how the delivery of a housing scheme on land at Old Farm, Chigwell, would not result in significant harm to landscape character, in accordance with Draft Policy DM 2. Landscape impact should not, therefore, be a reason to discount the site.

#### Draft Policy DM 5: Green Infrastructure: Design of Development

2.68 This policy demonstrates the importance the Council give to green infrastructure, indeed paragraph 4.121 of the Draft Local Plan states that green infrastructure is 'critical part of the future of the District'. However, the Council's proposed approach of developing existing open space for housing is clearly at odds with this strategy.

#### Draft Policy DM 6: Designated and undesignated open spaces

2.69 St Congar Provincial notes that the Council is proposing almost 850 dwellings on areas of existing open space.

2.70 Whilst St Congar Provincial fully accept that land within built-up areas should be prioritised for development before Green Belt land, in accordance with the NPPF, this relates to previously developed land within built-up areas, rather than cherished open space.

2.71 The significant development pressures facing District are apparent, with insufficient capacity within the built-up area to meet all growth needs over the Plan period. In such scenarios, it is critical that the Council adequately protect the character and appearance of existing settlements, with open space making up one of the most important attributes of such areas.

2.72 The Council is expecting development within town centres to exceed 50 dwellings per hectare (Draft Policy SP 4), which would leave limited opportunities to incorporate meaningful new open space. Further, due to the demonstrably finite nature of open space within urban areas, building on such spaces now would likely lead to a future deficit, resulting in adverse environmental and social issues. It is noted Loughton is, for example, expected to accommodate significant growth within existing open space, with no obvious measures to mitigate such losses.

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2.73 The Draft Local Plan at paragraph 4.129 acknowledges the importance of open and green space, advising that:

“Providing new public open space in new development is a critical part of maintaining healthy places to live and providing the contrast between the built areas and outdoor spaces that meet our social and psychological needs”. (emphasis added).

2.74 Paragraph 4.130 of the Draft Local Plan explains that the population growth of the District will only increase the demand for recreational facilities and local space. It also states that such areas are needed to improve lifestyles of many residents and to improve levels of life expectancy.

2.75 Furthermore, chapter 8 of the NPPF sets out the Government's position on the important role in which the planning system has in promoting healthy communities. Paragraph 73 states that

“Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.”

2.76 It is noted that paragraph 73 goes on to state that planning policies relating to open space, sports and recreation facilities should be based on “robust and up-to-date assessments”. However, the most recent assessment “Epping Forest Open Space, Sport and Recreation Assessment” was produced in 2012 by ‘The Landscape Partnership’. The current adopted Local Development Scheme (July 2016) timetables adoption of the plan for October 2018. St Congar Provincial do not consider this to represent an up-to-date assessment, in conflict with paragraph 73 of the NPPF.

2.77 Paragraph 4.132 of the Draft Local Plan states that the Council will seek to protect and improve open spaces, but in ‘exceptional circumstances’ development on part of an area of open space will be considered. St Congar Provincial do not consider that ‘exceptional circumstances’ exist to require development on open space.

2.78 Overall, St Congar Provincial consider that the Council's strategy to build upon existing open space fails to maximise the opportunities presented by a plan-led system and instead, adopts a short-sighted strategy, which will result in significant long term adverse environmental impacts for residents of urban areas. Instead, St Congar Provincial consider that the Council should allocate more growth on greenfield sites on the edge of sustainable settlements, such as land at Old Farm, Chigwell, where space permits development to be properly planned in a coherent manner. Land at Old Farm, Chigwell incorporates the provision of publically accessible open space, which not only serves the needs of the new development, but also that of the existing community. This would, in its own right, deliver significant environmental and social benefits.

#### Figure 5.1 – Settlement Hierarchy

2.79 Figure 5.1 sets out the settlement hierarchy for the District, which has been informed by the Settlement Hierarchy Technical Paper (2015). It is understood that the settlement hierarchy was determined by identifying the range of services and facilities available within each place. The scoring methodology for defining settlement categories is set out below:

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## Settlement Category Combined Facilities

Town 21+

Large Village 14-20

Small Village 7-13

Hamlet 0-6

2.80 St Congar Provincial note that Chigwell scored 20 points at the highest end of the 'Large Village' category and one point away from a Town designation, based on services. This is the highest performing Large Village, save for Buckhurst Hill, but is only proposed for limited growth in the Draft Local Plan.

2.81 North Weald Bassett is the worst performing Large Village, yet the settlement is proposed for the highest level of housing growth within its category. Within the whole District, the level of growth proposed is third only to Harlow and Epping.

2.82 St Congar Provincial has concerns regarding the level of growth around North Weald Bassett, particularly given the lack of a railway station within the village. As was highlighted earlier, one of the key characteristics of the District is the level of commuting into London and therefore proposing significant growth where this could not occur sustainably would fail to address such issues.

2.83 Chigwell is located geographically close to London and on a key commuter line and therefore provides a clear opportunity to locate new homes closest to the source of demand, where significant housing pressures exists, as exhibited by higher than average house prices for the area.

## Draft Policy P 7 Chigwell

2.84 Draft Policy P 7 allocates circa 430 dwellings in and around Chigwell, a figure which St Congar Provincial considers is significantly too low, having regard to the sustainable credentials of the settlement, as set out in the Old Farm, Chigwell Vision Document.

2.85 The largest allocation within Chigwell is SR-0588 (The Limes Estate), which is expected to deliver approximately 210 dwellings. This site is located on land currently designated as Public Open Space in the adopted Local Plan. St Congar Provincial's fundamental concerns with this approach are detailed earlier on in these representations.

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2.86 St Congar Provincial do not consider that any compelling evidence has been put forward to demonstrate why land at Old Farm, Chigwell should not be allocated and commentary on the evidence base in relation to this specific site is provided below:

#### Stage 2 Green Belt Assessment

2.87 Land at Old Farm, Chigwell falls within parcel 035.8 of the Green Belt Assessment: Stage 2, measuring 27.97 hectares in size. Land controlled by St Congar Provincial covers circa 50% of this parcel.

2.88 Having reviewed the Green Belt Assessment, it is apparent that land at Old Farm, Chigwell is one of the weakest performing sites in Green Belt terms around Chigwell, with only Green Belt purpose 3 (safeguarding the countryside against encroachment) scoring more than a 'moderate' rating. However, it is noted that paragraph 5.4 of the Green Belt Assessment states the following:

"The results of the assessment against purposes 1, 2 and 4 (i.e. excluding purpose 3), illustrated in Figure 4.6, provide a more nuanced picture of how Green Belt performs across the District. This may provide the Council with a better tool and evidence base upon which to make decisions about the performance of Green Belt across the District and those locations where Green Belt release may be more appropriate.

2.89 Figure 4.6 of the Green Belt Assessment demonstrates that on the basis of the above assessment, parcel 035.8 would only result in 'moderate' harm to the Green Belt as a result of its release. This represents comparable or better scoring than many other sites proposed for release from the Green Belt across the District. Further justification is therefore required for the Council to discount this site.

2.90 Despite the above, it is noted that the Green Belt Assessment concluded that the topography of the parcel is such that it slopes away from the settlement, creating a stronger relationship with the countryside than the village and that the eastern boundary along Green Lane is relatively weak, being defined by intermittent hedgerows. The Old Farm, Chigwell Vision Document sets out an appraisal of the site against the purposes of including land in the Green Belt and details how it performed very poorly against these purposes and is appropriate for release.

2.91 The agricultural track (Green Lane) and intermittent hedgerow along the eastern part of the site would form an identifiable boundary, having regard Table 3.1 of the Green Belt Assessment: Stage 2, albeit a 'weaker boundary'. Paragraph 3.3 of the Green Belt Assessment does however acknowledge that it can be appropriate to use 'weaker boundaries' to define boundaries but consideration needs to be given to potential strengthening. The Old Farm, Chigwell Vision Document demonstrates how such strengthening of the eastern boundary could occur.

2.92 Notwithstanding the above, attached at Appendix 1 and set out in Section 4 of these representations are alternative options the Council may wish to consider for land at Old Farm, Chigwell. Option 1 and 2 retains development to the west of the natural 'high point' within the site, limiting inter visibility with the open countryside to the east. Table 3.1 of the Green Belt Assessment: Stage 2 states that 'prominent physical features such as ridgelines or strong slopes' can form 'stronger boundaries', which the new eastern boundary is considered to comprise. Option 1 comprises a discrete first phase bound by intact/dense hedgerow and woodland to the east, again forming a 'stronger

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boundary' as defined by the Green Belt Assessment. Both options would therefore address the issues raised in the Green Belt Assessment: Stage 2 appraisal.

2.93 In addition to the above, St Congar Provincial is aware that the Council has recently granted consent for planning application ref. EPF/2899/15 at Chigwell Primary Academy to the north of Old Farm, Chigwell. This application was for:

"Major refurbishment of Chigwell Primary Academy (reserved matters) and enabling residential development (outline) comprising 32 no. detached residential properties together with associated off-street parking, dedicated parkin court for existing residents, garden space, new vehicular accessed from High Road (A113) and Vicarage Lane, external landscaping and associated development."

2.94 Such a scale of development will inevitably mean that the school and adjoining land no longer fulfil the purposes of including land in the Green Belt and should be removed as part of the Draft Local Plan. In doing so, development will have clearly jumped Vicarage Lane, leading to a new logical Green Belt boundary which follows dense hedgerow and tree lines.

A range of suggested revised Green Belt boundaries around Chigwell are shown in Section 4 of these representations.

#### Site Suitability Assessment

#### Flood Risk

2.95 The Site Suitability Assessment for land at Old Farm, Chigwell (ref. 16 SITE\_02) scores a single positive in relation to flood risk as it is stated the site is located within Flood Zone 2. The site is almost exclusively located outside of the flood plain other than the south eastern corner, which as shown in the Vision Document will not incorporate any built form. As such, and in accordance with the approach adopted for site ref. SR-0098, a double positive should be scored.

#### Impact on Archaeology

2.96 The Site Suitability Assessment for land at Old Farm, Chigwell (ref. 16 SITE\_02) scores a single negative in relation to archaeology. Being agricultural fields, the site is likely to have suffered from significant disturbance over the years. Therefore, having regard to the methodology for the Site Suitability Assessment, it should score neutral in this regard. It is noted site ref. SR-0098 scored neutral for Archaeology and there is no evidence to suggest why land at Old Farm, Chigwell should not, at the very least, score the same.

#### Capacity to improve access to open space

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2.97 The Site Suitability Assessment for land at Old Farm, Chigwell (ref. 16 SITE\_02) scores a single negative in relation to the capacity to improve access to open space. The site includes a small area of allotments but the submitted masterplan within the Vision Document shows how this could be contained, but importantly also how significant areas of additional open space could be provided on otherwise private land. Having regard to the methodology for the Site Suitability Assessment, the site should therefore score a neutral, if not a single positive.

#### Agricultural Land

2.98 The Site Suitability Assessment for land at Old Farm, Chigwell (ref. 16 SITE\_02) scores a double negative in relation to the impact upon agricultural land, principally as the Council consider that the site will result in the loss of best and most versatile agricultural land. There is no evidence to suggest that the site would meet this classification and as such, St Congar Provincial consider that the site should score a single negative.

#### Landscape Sensitivity

2.99 As detailed within the Landscape Technical Note prepared by Arc Landscape Design & Planning Ltd (see Appendix 2), there is no evidence to support a conclusion that the site is high in landscape sensitivity. Accordingly, the site should score a single negative.

#### Settlement Character Sensitivity

2.100 As detailed within the land at Old Farm, Chigwell Vision Document (June 2016) the proposals anticipate providing a mix of dwelling sizes and types to provide a balanced community, which inevitably results in a slightly higher density than the eastern part of the existing settlement. The development would however be sensitively designed to ensure that it respects the prevailing character and appearance of the area. Notwithstanding this, it is noted that Chigwell is principally comprised of detached dwellings, which the scheme could better reflect, should the Council desire a less balanced mix of housing. Ultimately, these details would be considered at the application stage and it is clear a sensitive scheme could be brought forward. Accordingly, St Congar Provincial consider that the site should score neutral in respect of settlement character sensitivity.

#### Topography Constraints

2.101 The Site Suitability Assessment for land at Old Farm, Chigwell (ref. 16 SITE\_02) scores a double negative in relation to topography constraints. St Congar Provincial notes that having regard to the Site Suitability Assessment, this would mean that the Council consider

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'topographical constraints in the site may preclude development'. St Congar Provincial is not aware of any evidence which would lead to this conclusion, indeed, the evidence submitted in the land at Old Farm, Chigwell Vision Document is to the contrary. The site exhibits some undulation but this is not unusual for a greenfield site in Epping District and the Vision Document demonstrates how the site could be developed, having regard to these features.

Furthermore, St Congar Provincial is aware of sites with materially greater topographical challenges being allocated within the Draft Local Plan (such as ref. SR-0026B and SR-0026C). St Congar Provincial consider that having regard to the methodology identified in the

Site Suitability Assessment, the site should score, at worst, a single negative in this regard.

## Summary

2.102 Having regard to the above, the table below provides a comparison between the scoring in the Site Suitability Assessment and the suggested amended scoring for land at Old Farm, Chigwell.

Ref. Criteria Site Suitability

Assessment

Scoring Amended

Scoring

1.1 Impact on Internationally Protected Sites 0 0

1.2 Impact on Nationally Protected sites 0 0

1.3a Impact on Ancient Woodland 0 0

1.3b Impact on Ancient and Veteran Trees

outside of Ancient Woodland (-) (-)

1.4 Impact on Epping Forest Buffer Land 0 0

1.5 Impact on BAP priority species or Habitats (-) (-)

1.6 Impact on Local Wildlife Sites 0 0

1.7 Flood Risk (+) (++)

1.8a Impact on Scheduled Ancient Monument /

Listed Building / Conservation Area/ Historic Park or Garden (+) (+)

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- 1.8b Impact on Archaeology (-) 0
- 1.9 Impact of Air Quality 0 0
- 2.1 Level of harm to Green Belt (-) (-)

## Ref. Criteria Site Suitability

### Assessment

### Scoring Amended

### Scoring

3.1 Distance to the nearest rail/tube station 0 0

3.2 Walking distance to nearest bus stop (with

at least peak hourly day service) 0 0

3.3 Access to employment (+) (+)

3.4 Distance to local amenities 0 0

3.5 Distance to nearest infant/primary school (+) (+)

3.6 Distance to nearest secondary school 0 0

3.7

Distance to nearest GP surgery 0 0

3.8 Access to Strategic Road Network N/A N/A

4.1 Brownfield and Greenfield Land (-) (-)

4.2 Impact on Agricultural Land (--) (-)

4.3 Capacity to improve access to open space (-) 0 / (+)

5.1 Landscape sensitivity (--) (-)

5.2 Settlement character sensitivity (-) 0

6.1 Topography constraints (--) (-)

6.2a Distance to gas and oil pipelines (-) (-)

6.2b Distance to constraining power lines 0 0

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### 6.3 Impact on Tree Preservation Order (TPO)

trees 0 0

### 6.4 Access to site (+) (+)

## Ref. Criteria Site Suitability

### Assessment

### Scoring Amended

### Scoring

### 6.5 Contamination constraints (-) (-)

### 6.6 Traffic impact 0 0

## 3.0 Land at Old Farm, Chigwell - Development Options

3.1 St Congar Provincial's submission to the Council earlier this year (June 2016) included a Vision Document for land at Old Farm, Chigwell. This submission set out a comprehensive assessment of the site, which culminated in a vision and concept masterplan, demonstrating how circa 300 market and affordable dwellings could be delivered, alongside a significant area of publically accessible open space, equipped play space, allotments and a new alignment of Vicarage Lane.

3.2 The Draft Local Plan does not propose to allocate the site for development and the supporting evidence base seeks to justify this position. The above representations by St Congar Provincial highlight our fundamental concerns with the Draft Local Plan and the evidence base, including a number of conclusions relating to land at Old Farm, Chigwell. Overall, it is considered that the comprehensive development approach to the site remains a robust solution that would deliver significant benefits and accordingly should be re-appraised by the Council, in light of the highlighted errors.

3.3 Notwithstanding the above, St Congar Provincial does consider that the site divides into a number of logical phases, based on existing physical features, which does present a range of possible options for the site, should the Council be minded not to allocate the entire site for

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development. The development options are set out in at Appendix 1. The corresponding suggested Green Belt boundary amendments are shown at Figure 2 below.

Figure 2. Suggested Green Belt Boundary Options

#### Option 1

3.4 As detailed in the land at Old Farm, Chigwell Vision Document, the site has varying degrees of Green Belt and landscape sensitivity, with the western parcels forming the less sensitive part and the eastern side forming a slightly more sensitive (but still contained) area for development.

3.5 Based upon allocations within the Draft Local Plan, recent planning consents and existing physical features in the form of a dense hedgerow / tree belt, it is considered that Option 1 would comprise an exceptionally well contained development parcel, closely related to the existing settlement and existing/proposed development to the north. This option/phase could deliver circa 80-100 dwellings based upon a density of 25-30dph.

#### Option 2

3.6 Option 2 comprises additional field parcels in the centre of the site, running up to the main north/south ridgeline of the site (which also comprises an intermittent hedgerow with mature trees). As detailed earlier in these presentations, the Council's Green Belt Assessment methodology confirms that topographical features such as ridgelines can comprise defensible and permanent Green Belt boundaries. This option/phase would deliver circa 165-200 dwellings (in combination with option/phase 1), based upon a density of 25-

30dph.

#### Safeguarded Land

3.7 As referenced earlier in these representations, the Council should, where necessary, identify areas of safeguarded land in order to meet longer-term development needs stretching well beyond the Plan period (NPPF para

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85). Whilst St Congar Provincial considers that a clear case exists for the entire site to be allocated in this Plan period, the Council could consider the merits of safeguarding the eastern parcel, should this be justified.

#### 4.0 Summary

4.1 Land at Old Farm, Chigwell is a suitable and sustainable location for residential development and is well placed to address acute housing pressures in the District.

4.2 The site is available for residential development and could accommodate up to 250-300 market and affordable dwellings, based upon a density of 25-30dph. Alternatively, a range of smaller options exist within discrete parcels on the site, including up to 100 dwellings in option 1 up to 200 dwellings for option 2 (the latter of which also includes option 1).

4.3 The release of the site from the Green Belt for each of these potential phases does not conflict with the five purposes of including land in the Green Belt and would make a meaningful contribution towards the housing needs of the District over the next plan period. Accordingly, exceptional circumstances exist to justify the release of the site from the Green Belt.

#### Land at Old Farm, Chigwell

##### Phased Development Option - Landscape Considerations

December 2016

#### Introduction

This note has been prepared by Vanessa Ross, director and landscape architect at Arc Landscape Design and Planning Ltd. and addresses the potential landscape issues relating to a phased option for development, focussing on of the western part of the site as illustrated on the accompanying plans prepared by DLA Architects Practice.

The revised development options would, in respect of landscape matters, have the potential to more readily integrate into the existing settlement pattern with development following the line of the existing hedge that extends southeast across the site from the school to the north. This integration is reinforced by the recently approved residential development on land to the west of the school.

This note should be read in conjunction with the original Vision Document which provides further detail on the landscape character, visual analysis and Landscape Enhancement Opportunities for the wider site much of which remain relevant to the phased development approach.

#### Effects on Landscape Sensitivity

The Site Suitability Assessment states that the wider land parcel is categorised as having a high landscape sensitivity. It is noted however that the land falls outside (but adjacent to) an area of high landscape sensitivity as classified by the Epping Forest District Settlement Edge Sensitivity Study - March 2012. This study identified land

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described as 'Landscape Setting Area' adjacent to settlements and as the site was not covered by the assessment it is unclear how the 'High Sensitivity' has been arrived at.

In developing the site in two potential phases we would argue that the proposed phase 1 would be generally located on land less sensitive which is largely based on the following

- ? Part of the land is in poorer condition or taken up with allotments
- ? The separate development parcels would be well screened by existing and reinforced vegetation
- ? The proposed layout incorporates a new public open space and road alignment which would assist in assimilating the new housing with those existing on Vicarage Lane.

The expansion into Phase 2 will similarly sit alongside a natural boundary of the existing hedgerow which could be reinforced with additional native planting. Whilst closer to the public right of way which runs along the eastern boundary of the site, a degree of benefit is gained from the separation between the path and the proposed development.

#### Potential Effects of Development on surrounding views

When viewed from the west the proposed option one will be clearly visible though often partially screened by vegetation. Views of houses from the south of Vicarage Lane will be more prominent as the land is currently visible due to low or no vegetation along the boundary.

With the addition of Phase 2, it is possible that some of the properties on higher land will become visible from the east but these would be seen in and through the properties within Phase 1 and therefore the cumulative impact is lessened.

Views from the east would change to see parts of the development in Phase 1, however from further afield these would be seen in the context of existing properties along Vicarage Road. Similarly with the inclusion of Phase 2, it is unlikely that the cumulative effects from further afield would be discernible.

Ref - A13 1 -Option 2 - FN02 Landscape Text FINAL

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