
Epping Forest District Council

Examination of the District Local Plan

Response to Inspector's Matters, Issues and Questions
On behalf of Higgins Homes PLC (ID 19LAD0075)

Matter 5

Site Selection Methodology and the Viability of Site Allocations

February 2019

**Epping Forest District Council
Examination of the District Local Plan**

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**Matter 5:
Site Selection Methodology and the Viability of Site Allocations**

Barton Willmore LLP on behalf of Higgins Homes PLC

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1.0 INTRODUCTION

- 1.1 Barton Willmore LLP is instructed by Higgins Homes PLC to submit this hearing statement in response to questions posed under Matter 5 of the Inspector's Matters, Issues and Questions (ED5).
- 1.2 Higgins Homes PLC owns land at Luxborough Lane, Chigwell (EFDC site reference: SR-0108) which it is promoting for residential development in this Local Plan. The land is located in the Green Belt, is available now for development and could accommodate between 45 and 90 dwellings.
- 1.3 Our response is limited to questions posed under the following Issues:
- Issue 1 – Questions 1a to 1e, 4 and 6
 - Issue 4 - Question 1
- 1.4 Please find below our responses to the above questions.
- 1.5 Please note that we have no comment to make with regards to Issues 2 and 3 under Matter 4.

2.0 SITE SELECTION: ISSUE 1: HAVE THE PLAN'S HOUSING ALLOCATIONS BEEN CHOSEN ON THE BASIS OF A ROBUST ASSESSMENT PROCESS?

1. The Council should provide a summary of the process by which the Plan's housing allocations were selected. In particular:

- a. How was the initial pool of sites for assessment identified?**
- b. How was the Site Selection Methodology (SSM) utilised in the Site Selection Report 2018 (EB805) established and is it robust?**
- c. What is the relationship between the SSM and the sequential approach to site selection set out in Policy SP2(A)?**
- d. What was the role of the Sustainability Appraisal in selecting between the various sites?**
- e. Was any other evidence taken into account in the site selection process? In particular, how has the historic environment been taken into account? Have Historic Impact Assessments been undertaken as recommended by Historic England and, if not, is this necessary?**

2.1 In making our response to this Issue we note that a number of the questions being asked are directed specifically at the Council (including 1a to 1e). We do have, however, our own specific concerns about the Site Selection process which has been undertaken by and on behalf of the Council.

2.2 Rather than seek to give specific answers to questions 1a to 1e, we instead wish to provide a single response which addresses these questions as a whole.

2.3 To this end, we consider that there has been an accumulation of flaws in the site selection process since the start of the Local Plan process which have led to sites not being properly assessed in terms of their actual suitability for residential allocation. This flawed process began before the publication of the Local Plan Consultation in 2016 and has, in our opinion, become accentuated as the Local Plan process has progressed.

2.4 In doing so, we wish to point to the flaws which we are aware of from having sought to promote Higgins Homes' site at Luxborough Lane, Chigwell. We consider that this site, if allocated, could deliver between 45 and 90 dwellings without significant adverse environmental effects and would not prejudice the long-term separation of Chigwell and Loughton / Buckhurst Hill.

2.5 Outlined below are a number of evidence based documents that have made overarching, overly simplistic or potentially misleading conclusions that have since been relied upon by the Council in its Site Selection process and which, we consider, have led to sites such as Higgins Homes' site at Chigwell not being properly considered as being suitable for residential allocation.

- **Epping Forest District Council Settlement Edge Landscape Sensitivity Study (January 2010) [EB712]**

2.6 This particular assessment of land at Chigwell appears to have formed a starting point for the Council to consider that the majority of land on the western side of Chigwell is not suitable for development.

2.7 In this regard, Figure 15.4a (after page 124) of the Study identifies a large swathe of land alongside the M11 extending beyond the northern and southern edges of Chigwell as 'Landscape Setting 1'. This defined area includes Higgins Homes' land at Luxborough Lane and Site Allocation CHIG.R5. The Study concluded that Landscape Setting 1 has a 'Moderate' overall Landscape Character and Visual Sensitivity. Paragraph 15.6.1 concluded at paragraph 15.6.1 that "*those Landscape Setting Areas identified as high or moderate overall sensitivity are considered desirable to safeguard in landscape terms and are considered to have a significant role in contributing to the structure, character and setting of the settlement*".

2.8 However, we consider that the above conclusion is flawed because it does not take account of the possibility that smaller parcels within these large Landscape Setting study areas might not be subject to the same 'moderate' or 'high' landscape sensitivities. For example, the Council has in fact proposed the allocation of one site within Landscape Setting 1 (i.e. Site CHIG.R5), which abuts Chigwell High Road and is in close proximity to Higgins Homes' site at Luxborough Lane. We would also argue that Higgins Homes' site is also visually contained and, therefore, also does not have the kind of landscape sensitivity that should preclude its consideration by the Council as a potential residential allocation site.

2.9 In addition, we do not consider that Higgins Homes' site falls within a 'valued landscape' in this immediate area (as referred to in Paragraph 109 of the NPPF and paragraph 170 of the Revised NPPF). The site is enclosed by an area of woodland, the M11 motorway, Luxborough Lane and existing residential development. Indeed, the Site Suitability Assessment [EB801Gii] concludes that "*The site falls within an area of medium landscape sensitivity - characteristics of the landscape are resilient to change and able to absorb development without significant character change*".

- **Green Belt Review Stage One (September 2015) [EB704A] and Epping Forest District Green Belt Assessment: Stage 2 (August 2016) [EB705A]**

2.10 Another flaw in the Council's assessment of potential residential allocation sites which occurred at the early stages in the Plan making process relates to its use and interpretation of the findings of the two Green Belt studies [EB704 and EB705].

2.11 Without repeating in detail what we stated in our response to Matter 4 (see paragraphs 4.8 to 4.11), we consider that small individual sites being promoted for housing have, in some cases, been unfairly assessed and conclusions about their suitability arrived at prematurely. This is because they have been assessed within much larger areas which have been judged by the Council to perform stronger Green Belt functions. In the case of Chigwell, large swathes of land on the western side of the settlement have been assessed and no specific consideration given to individual sites being promoted by landowners and developers.

2.12 Even when the Stage 2 assessment [EB705A] reduced the assessment parcel containing Higgins Homes' site at Chigwell compared with the assessment parcel in the Stage 1 report, the area identified for assessment still didn't allow for the opportunity to create a parcel of development that would respect the important functions of the Green Belt in this area or take account of the function of surrounding land in maintaining openness and a defensible separation between Chigwell and Loughton/Buckhurst Hill.

2.13 Furthermore, and similar to the point we made in relation to the Council's Settlement Edge Landscape Sensitivity Study, we note that there is inconsistency in the way in which sites have been selected for allocation because within the same area identified in the Stage 2 assessment for Chigwell that contains Higgins Homes' site and is considered to have 'Very High' harm, the Council has proposed the allocation of site CHIG.R5. We would argue that it is appropriate to allocate this site and to give further consideration to allocating Higgins Homes' site as well.

- **Epping Forest District Strategic Land Availability Assessment (SLAA) (July 2016) [EB800/EB800A]**

- 2.14 An important document that has been used by the Council to select sites is the SLAA. In the SLAA it is considered that Higgins Homes' site has a capacity of 150 dwellings. As we have consistently stated to the Council, the development capacity of the site is between 45 and 90 dwellings, possibly as low as 30 dwellings depending on which parts of the site are developed. This information does not appear to have been taken into consideration in the site selection process.
- 2.15 The SLAA also notes that the site includes land within Flood Zones 2, 3a and 3b; a high-pressure gas pipeline and an area covered by a TPO and that this would reduce the developable area of the site. Again, we have stated to the Council that such constraints would not prevent the development of the site or the achievement of between 45 and 90 dwellings.
- 2.16 Whilst such matters are for detailed discussions with the Council, we note that in the context of site selection through the Local Plan process, the manner in which Higgins Homes' site has been assessed in the SLAA has negatively and inappropriately influenced the Council's site selection.

- **Epping Forest District Local Plan Report on Site Selection (September 2016) [EB801]**

- 2.17 The inaccurate representation of the development capacity of Higgins Homes' site was carried forward into the September 2016 Site Selection report. Instead of assessing between 45 and 90 dwellings, the consultant on behalf of the Council assumed that 150 dwellings should be considered. The Site Selection report also referred to the constraints that were identified in the SLAA. As regards those criteria which the assessment considered to be particularly negative and called into question the suitability of the site, we call into question their validity because we do not consider that they were sufficiently tested against what Higgins Homes is actually promoting for the site. For example:
- (i) Whilst the assessment concluded that the site would involve the loss of best and most versatile agricultural land, no site-specific assessment has been undertaken in relation to the site to confirm that this is actually the case (only, we understand, what is provided on very high-level DEFRA mapping);

- (ii) The assessment points to 40% of the site being in the HSE inner consultation zone and, therefore, development should not occur in the 'affected area'. However, in material submitted to the Council, Higgins Homes has stated that no development would occur in this location.
- (iii) The assessment refers to protected tree cover on or adjacent to the site and that this would have a significant adverse impact on the suitability of the site for development. However, Higgins Homes' proposals do not need to involve the loss of trees or groups of trees. Again, evidence has been submitted to the Council which presents a range of options for the allocation of the site, ranging from 45 - 90 dwellings.

2.18 Tellingly, the assessment concludes in relation to the effect of the development on Settlement character sensitivity that "*The proposed number of houses is at a higher density than the neighbouring developments. Therefore, development is likely to affect the character of the area*". This conclusion emphasises our argument that the assessment of the site is based on flawed assumptions. The scale of development being proposed, and its physical extent within the site, is actually much smaller than envisaged by the Council and its consultants.

- **Developer Meeting with EFDC on 21st November 2016**

2.19 Following a meeting between Higgins Homes and the Council, a Site Proforma was issued that summarised the meeting and the Council's assessment of the site (see Appendix 1). In the Proforma, reference was made to the SLAA and its assumptions about Higgins Homes' site (see above) and reference made to how the site performed against the 4 stages of Site Selection process.

2.20 We think it is important to note that in the overview of the assessment (second page), the reason why the site was not considered suitable at Stage 3a (third page) and in the final decision (third page) was that the site was noted to be "*part of a strategic option which was judged to be a less favourable growth direction*" and that "*this option would cause significant harm to the Green Belt, risking coalescence of Chigwell and Loughton / Buckhurst Hill*".

2.21 As we have stated above, we do not consider these conclusions to be correct and, by referencing adjoining land (in some cases very large swathes of land) in the assessment of this site, the Site Selection process has unfairly and unreasonably arrived at conclusions about Higgins Homes' site that don't specifically relate to it.

2.22 Furthermore, as regards the summary note provided with the Proforma (fourth page), whilst we agree that Higgins Homes' site is potentially suitable, available and achievable, we consider that the site constraints which are listed do not restrict the ability of Higgins Homes to build between 45 and 90 dwellings and that the Council should be in a position to allocate this site for housing.

- **Epping Forest District Local Plan Report on Site Selection (March 2018)
[EB805]**

2.23 With regard to the final assessment document which forms part of the evidence base of the Local Plan, we note that the consultant on behalf of the Council looked both at strategic and site-specific development options relating Chigwell.

2.24 In the assessment of the strategic option (i.e. Western expansion of Chigwell), the report concluded that it was a 'Less suitable strategic option'. In doing so, the assessment referred to the Green Belt Review: Stage 2 (2016) [EB705A] and the Settlement Edge Landscape Sensitivity Study (2010) [EB712]. Both of these reports, as we have highlighted above, whilst potentially relevant to wider swathes of land, do not necessarily provide suitable guidance as to the development potential of smaller sites (such as Higgins Homes' site at Chigwell).

2.25 In terms of Higgins Homes' site at Chigwell, the assessment simply repeats the previous conclusion that "*the site falls within a strategic option which was considered to be less suitable*". As a result, "*the site did not proceed for further testing beyond Stage 3*".

- **Tests of Soundness**

2.26 When judged against the tests of soundness in the NPPF (Paragraph 182), we consider that the Plan is not:

- (i) Positively prepared - As stated in our response to Matter 3, the Plan will not meet objectively assessed development requirements.
- (ii) Justified - The strategy being promoted by the Council is not the most appropriate when considered against the reasonable alternatives which should have been given more detailed consideration in the preparation of the Plan. As stated above, the evidence base upon which the Plan has been prepared is not 'proportionate' because it has not given sufficient consideration to the potential for the residential allocation of small to medium scale sites in sustainable locations such Higgins

Homes' site at Chigwell. Throughout the Plan making process the opportunity for allocating suitable small / medium sites for housing has been ruled out by the Council because sites such as land at Luxborough Lane, Chigwell has been included in wider areas ('strategic options') which have been judged by the Council to perform different, potentially more significant, landscape and Green Belt roles. As we have stated above, we do not consider that Higgins Homes' site at Chigwell performs a significant landscape and Green Belt role.

- (iii) Effective - As stated in our response to Matter 3, the Plan will not meet objectively assessed development requirements. Based on the current number and size of proposed residential allocations in the Plan, this will result in the delivery of fewer sites than are required to meet housing needs during the Plan period. This situation will be exacerbated if the Council is required to plan for more housing to meet its full OAN, because we consider the evidence base unfairly treats suitable small to medium size residential sites such as Higgins Homes' site at Chigwell.
- (iv) Consistent with national policy - The Plan is unlikely to deliver sustainable development to the extent required to meet the Council's full OAN. As stated above, the Plan's evidence base does not take into full account, and indeed unfairly assesses, the opportunities which could be taken to allocate suitable small to medium size residential allocation sites (such as at Luxborough Lane, Chigwell) – which could deliver sustainable development.

- **Request**

2.27 In view of these arguments, and should the Inspector conclude that further land is required to be allocated for housing in this Local Plan, the Council should be requested to review its Site Selection process and give further, more detailed consideration of sites such as Higgins Homes' site at Chigwell for residential allocation.

2. **How were the conclusions reached about individual sites checked for accuracy and consistency? Were sites visited or were they assessed through a desktop process? What has been done to check the assessments in specific cases where their accuracy has been challenged e.g. Site SR-0596? (Reps 19LAD0012).**

2.28 No comment.

- 3. As raised in Matter 1, Issue 2, some sites which were proposed for allocation in the Regulation 18 version of the Plan are not proposed in the Regulation 19/submitted version and vice versa. Is this due to changes in the site selection process, or something else? Are the different conclusions reached about the relevant sites fully explained and justified?**

2.29 No comment.

- 4. Having regard to Question 1c above, is the sequential approach to site allocation set out in Policy SP2(A) justified, particularly in respect of the value placed upon open spaces within settlements? How was the adequacy of remaining open space within a settlement measured (Policy SP2(A)(iv))?**

2.30 No comment.

- 5. Now that the site selection process is complete for the purpose of making allocations in the Plan, is it necessary to include the sequential approach within Policy SP2(A)?**

2.31 Subject to the forthcoming discussions at the Examination about this and other related Matters, if it is concluded that the priority should be to adopt the Local Plan in the short term, then we would ask that further consideration is given either to the safeguarding of Green Belt sites for future allocation; or that the recommendation is made for the Local Plan to be reviewed immediately in order to undertake a further more detailed assessment of the Green Belt to identify additional land for housing allocation.

- 6. Is it justified to allocate station car parks (EPP.R3; LOU.R1, LOU.R2; BUCK.R2; THYB.R2) and other car parks (EPP.R6, EPP.R7) for housing? Can adequate parking for both commuters and residents be provided; and how will short-term disruption to commuter parking during the construction phase be addressed?**

2.32 As a general observation, we consider that the level of existing car parking at these station car parks should be retained if this will encourage an overall shift from car travel to the use of public transport.

3.0 ISSUE 2: HAVE THE PLAN'S ALLOCATIONS FOR GYPSIES & TRAVELLERS AND TRAVELLING SHOWPEOPLE BEEN CHOSEN ON THE BASIS OF A ROBUST ASSESSMENT PROCESS?

1. The Council should provide a summary of the process by which the Plan's allocations for Gypsies & Travellers and Travelling Showpeople were selected. In particular:
 - a. How was the initial pool of sites for assessment identified?
 - b. How was the Traveller Site Selection Methodology (TSSM) utilised in the Site Selection Report 2018 (EB805) established and is it robust? Is it consistent with national policy in the Planning Policy for Traveller Sites?
 - c. What is the relationship between the TSSM and the sequential approach to site selection set out in Policy SP2(D)?
 - d. What was the role of the Sustainability Appraisal in selecting between the various sites?
 - e. Was any other evidence/factors taken into account in the site selection process?

3.1 No comment.

2. Is the sequential approach to delivering accommodation for Gypsies & Travellers and Travelling Showpeople justified in respect of the following issues in particular:
 - a. How have the benefits of seeking to regularise existing unauthorised sites and sites with temporary permission been weighed against the potential harms, including to the countryside and Green Belt? Will this lead to the concentration of Traveller sites in certain areas, such as Roydon?
 - b. Is it justified to prioritise the provision of new sites in the countryside and Green Belt over making provision as part of the development of other allocated sites?

3.2 No comment.

4.0 ISSUE 3: HAVE THE PLAN'S NEW EMPLOYMENT ALLOCATIONS BEEN CHOSEN ON THE BASIS OF A ROBUST ASSESSMENT PROCESS?

1. How were the five new employment site allocations chosen from the alternatives indicated to be suitable in the Employment Land Supply Assessment?

4.1 No comment.

5.0 VIABILITY: ISSUE 4: AT THE BROAD STRATEGIC LEVEL, ARE THE PLAN'S ALLOCATIONS FINANCIALLY VIABLE?

- 1. Having regard to paragraph 173 of the NPPF, are the Plan's allocations for housing (including for Travellers) and employment financially viable, having regard to the normal cost of development and mitigation; and all relevant policy costs, including for affordable housing, space standards, building requirements, design and potential infrastructure contributions?**

5.1 Although not currently allocated for development, Higgins Homes note that it owns the freehold interest in the land it is promoting for development at Luxborough Lane, Chigwell. This is a positive factor in concluding that the development of this land for between 45 and 90 dwellings will be financially viable. In this regard, Higgins Homes has also accounted for the presence of technical constraints (such as the maintenance of an open corridor for the gas pipeline, respecting areas covered by TPOs etc) in determining the development capacity of its site.

APPENDIX 1.0

Site Proforma

Site Proforma for developer meetings for sites not proposed for allocation
Summary of assessment process and current status in relation to Epping Forest District Draft Local Plan
November 2016

Last Updated	07 November 2016		
Site Reference	SR-0108		
Address	Land to west of Chigwell Park drive and to north of Luxborough Lane, Chigwell		
Parish	Chigwell		
Site Boundary			
	No changes made to site boundary.		

Strategic Land Availability Assessment (2016)					
SLAA Reference	SR-0108				
Source of site (SLAA)	Call For Sites (2008)				
Call for Sites	Date	Respondent Ref	Name	Organisation	
	16 July 2008	CFS-RR-0058	Joe Leedham	Higgins Homes	
Planning History (CfS Submission)	Not available				
Supporting Information	Yes	CfS form and cover letter received from Higgins Homes in 2008. Correspondence from Barton Willmore, representing Higgins Homes, in 2011. Promoter material received, dating to 2013, proposing between 45 and 90 units.			
Site Notes (SLAA*)	Fallow land and woodland				
Yield (SLAA*)	Dwellings	Comm Sqm	Pitches	Basis / Constraints	
	150	0	0	Assumption based on 30 dph. High pressure gas pipeline running through site, requiring 15m buffer zone. Flood Risk reduces developable area by 1/2	

Result of SLAA Assessment	Discounted at Stage A? **	Suitability ***	Availability	Achievability	
	No	Suitable - Outside Current Policy (Green Belt)	Available	Achievable	
SLAA Summary	Final Categorized Assessment		Final Summary		
	Suitability: Suitable - Outside Current Policy (Green Belt), Availability: Available, Achievability: Achievable		Site is suitable, but is within the Green Belt. Band of Flood Risk Zone 3a, 3b and 2 across central area of site, along with high pressure gas pipeline running through site, and circa half of site is TPO trees. This would reduce developable area of site substantially.		

Site Selection Methodology (2016)					
	Pre Stage 1	Stage 1	Stage 2	Stage 3	Stage 4
Overview of Assessment	✓	✓	✓	✗	
	This site is part of a strategic option which was judged to be a less favourable growth direction. This option would cause significant harm to the Green Belt, risking the coalescence of Chigwell and Loughton / Buckhurst Hill.				
Stage 1 assessment findings - Major Policy Constraints	Proceed	Site is entirely or partially unconstrained.			
Stage 2 assessment - Criteria scoring (--)	2.1 Level of Harm to Green Belt.		Site is within Green Belt, where the level of harm caused by release of the land for development would be high or very high.		
	4.2 Impact on agricultural land.		Development would involve the loss of the best and most versatile agricultural land (grades 1-3).		
	6.2a Distance to gas and oil pipelines.		Some 40% of the site is in the HSE inner consultation zone running along the middle of the site. Due to the location of the consultation zone mitigation would be difficult. Sensitivity level 3. HSE guidance is advise against development for affected area.		
	6.3 Impact on Tree Preservation Order (TPO).		The extent of the protected tree cover on or adjacent to the site would be likely to have a significant adverse impact on the suitability of the site for development.		

Stage 3a assessment findings	Strategic Option		Strategic Option Summary	
	Chigwell - western expansion		Less suitable strategic option	
	This option would cause significant harm to the Green Belt, risking the coalescence of Chigwell and Loughton/Buckhurst Hill.			
	Site area (ha) (from SLAA)	Capacity (units) (From SLAA)	Site suitability	
	9.70	150	Not suitable	
	This site is part of a strategic option which was judged to be a less favourable growth direction. This option would cause significant harm to the Green Belt, risking the coalescence of Chigwell and Loughton / Buckhurst Hill.			
	Land Preference Hierarchy: Category N/A		The site does not proceed for further testing.	
The site should not proceed for further testing.				
Developer Survey Response	Survey Sent	Response Received	Summary	
	Yes	Yes	Developer survey response received 4th July 2016 from Mr Neville Surtees (Higgins Homes) for approximately 90 residential units.	
Amendment to Site Boundary	No	No amendment was made to the site boundary during the site selection process.		
Stage 3b Detailed Capacity Assessment	Unconstrained Site Area	#N/A	Indicative net site capacity (units)	#N/A
	Not applicable.			
Stage 3b Availability and Achievability assessment	Not applicable.			
Final decision	This site is part of a strategic option which was judged to be a less favourable growth direction. This option would cause significant harm to the Green Belt, risking the coalescence of Chigwell and Loughton / Buckhurst Hill.			
Commencement year				
Site development trajectory				

Summary Note

Whilst the SLAA found this site to be potentially suitable, available and achievable, the Site Selection process found that the site scored poorly against a number of Stage 2 Criteria. HSE gas pipelines pose a significant constraint, the site is substantially affected by TPOs, release of the land would have significant harm to the Green Belt. The site is located in a less preferred strategic option for growth in the settlement. The site did not proceed for further testing at Stages 3 and 4.

Date	<i>Monday 22nd November 11:15 am</i>
Attendees	<i>William Higgins (Higgins Homes), Developer Neville Surtees, (Barton Willmore), Agent Alison Blom-Cooper, EFDC William Marr-Heenan, EFDC</i>
Issues raised	<p><i>Promoter provided questions for clarification to Planning Policy team. This had not been received, however the points were addressed in turn at the meeting.</i></p> <p><i>Promoter objected to the site not being allocated, and cited the recent Anderson development in Luxborough Lane which has been granted permission. EFDC clarified that the Draft Local Plan is taking a forward-looking approach to distributing growth across the District in the most appropriate locations, and that is not driven by past planning decisions.</i></p> <p><i>Promoter queried the approach taken to allocating sites, and how the numbers of homes identified for each settlement had been agreed – EFDC clarified that growth options were considered at a strategic level across the District, and then at the settlement scale, taking into account community consultation, the number and mix of suitable sites, and the District’s housing needs. Enough sites located within Chigwell meant that other sites in less suitable locations / less preferable land categories were not required.</i></p> <p><i>Promoter asked whether the representations can be made based on site-specific issues, EFDC confirmed this however noting that the decision made on this site at Stage 3 was primarily due to site being within a strategic option judged to be a less preferable direction for growth.</i></p> <p><i>Argued that the site selection process didn’t take into account the submitted material and proposals, which are only on part of the site, and for a smaller number of units than that recorded in the SLAA. EFDC clarified that the site fell out at Stage 3, therefore revised proposals / site plan would not likely affect the reasons for non-allocation.</i></p> <p><i>Questioned the status of the employment sites that are illustrated on the Chigwell map of the Draft Plan. EFDC clarified that all employment sites identified in the SLAA were included on the map in order to gather consultation responses, however site selection work on employment sites is yet to take place.</i></p> <p><i>Questioned the agricultural land classification, and queried the source. EFDC confirmed this was sourced from DEFRA mapping, and that the classification the land fell within was applied to the site. Questioned TPO assessment, and archaeological assessment – EFDC referred to the relevant Stage 2 Criteria methodology set out in the appendices to the Site Selection Report. Questioned landscape impact assessment - EFDC made reference to the Landscape Character Assessment and the Settlement Edge Landscape Study.</i></p> <p><i>Promoter noted that access can be delivered on-site land and that this would not be a constraint. Questioned why the contamination assessment scored (-) - EFDC clarified that this was based on EFDC Contamination Officer assessment, however for this site it was felt constraints can likely be mitigated.</i></p>
Follow up	<p><i>EFDC to provide PDF mapping of TPO data for the site area.</i></p> <p><i>Promoter invited to make representations to the Draft Plan on the issues raised.</i></p>

** The site notes and indicative capacity recorded in the SLAA were reviewed and updated during Stage 2 of the Site Selection Methodology in instances where the site boundary was changed, for instance where the site was split into two sites, in order for the notes and site yield to accurately reflect the amended site boundary for the purposes of the Stage 2 assessments.*

*** The SLAA Assessment (2016) discounted sites at Stage A that were subject to Major Strategic Constraints, which are: Flood Risk Zone 3b, environmental designations (SSSI, Ancient Woodland, Epping Forest and its buffer lands and others), and Heritage designation (SAM, Historic Parks and Gardens). Sites discounted at Stage A were not assessed further in the SLAA.*

**** Sites found unsuitable at Stage B of the SLAA (2016) did not proceed for further assessment on availability or achievability in the SLAA.*

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