

Carter Jonas

MATTER 15 HEARING STATEMENT

Epping Forest District Council Local Plan Examination

SUBMITTED ON BEHALF OF LONDON SQUARE DEVELOPMENTS

April 2019

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1 INTRODUCTION

- 1.1 This statement has been prepared on behalf of our client, London Square, who are the landowners of 'Front Site, Former Grange Farm, High Road, Chigwell' (Site 2).
- 1.2 Site 2 was acquired by London Square in January 2015 along with Site 1 which is located to the north east of Site 2 on Grange Farm Lane. Both Sites 1 and 2 originally formed part of 'Grange Farm' which was historically occupied for leisure and recreational uses as a camping ground. Grange Farm Centre is now located to the north of Site 2 providing recreational and sports facilities. Members resolved to grant planning permission for 43 residential units at Site 1 in November 2015 and permission was granted on 1 August 2016.
- 1.3 Site 2 has been promoted for release from the Green Belt for the purposes of residential development at every consultation opportunity associated with Epping Forest District Council's Draft Local Plan (DLP). Whilst the site was identified as a suitable and deliverable housing site in the previous draft iterations of the Local Plan, it has been removed from the submission version of the plan without any prior notification or evidence to justify it.
- 1.4 As a result, London Square cannot support the DLP and Carter Jonas will attend the hearing sessions most relevant to Site 2 on behalf of London Square.
- 1.5 This statement outlines London Square's comments in respect of Matter 15.

2 MATTER 15: PLACES AND SPACES (POLICIES P1-P15)

2.1 We respond to the specific issues arising in relation to Matter 15 below:

Issue 2: Are the Plan's policies for the specific places and sites within the District justified, effective and consistent with national policy; and the specific site allocations they include justified and deliverable?

Policy P7: Chigwell

Question 1. Paragraph 5.104 indicates that the Plan makes twelve residential allocations in Chigwell, but only eleven are included in the Policy. Does this require correction?

2.2 Given that Paragraph 5.104 indicates there is the need for the allocation of twelve sites in Chigwell to meet the identified housing requirement, we contend that Policy P7 'Chigwell' (including only eleven sites) requires amendment. We suggest that Site 2 is added to the eleven residential sites included in this policy in order to align the Policy with the supporting text in Paragraph 5.104. The Site is available now, offers a suitable location for development now, and is achievable with a realistic prospect that housing could be delivered within five years.

Question 2. What is the significance of the "Community Hub" referred to by Chigwell Parish Council? Should Part C refer to this, or is it to be delivered in some other way? Should reference to the Hub be made in the vision on page 147?

2.3 Policy CHG5 'Supporting Community Assets' of the Submission Version of the Chigwell Neighbourhood Plan sets out proposals to develop a new Community Hub facility for Chigwell at the Victory Hall site on Hainault Road, as shown on the Policies Map, on land to be made available for this purpose by the Parish Council. Although the independent examiner found that the Neighbourhood Plan should not proceed to referendum, we consider that the Parish Council's aspiration for a Community Hub in Chigwell should be included in Part C of Policy P7 'Chigwell' as well as in the vision on page 147.

2.4 In the Report on the examination of the Chigwell Neighbourhood Plan, the examiner urges "*the Parish Council to continue to engage with the Local Plan making process and also to take up the offer of discussions with the District Council planners with regard to issues such as funding of the Community Hub*". We contend that the delivery of Site 2 could assist with the collection of Community Infrastructure Levy (CIL) funds necessary to bring forward the Community Hub facility, and we therefore urge the Council to include Site 2 as a residential allocation in Policy P7 'Chigwell'.

Question 3. CHIG.R6 (Limes Farm Masterplan Area): Do the requirements of Parts G-J adequately reflect the aims of the Chigwell Neighbourhood Plan in preparation? Is this allocation justified in respect of its impact on open space provision in the

locality? Were smaller scale alternatives which might have avoided the loss of open space considered, and why were they rejected?

- 2.5 The Limes Farm Masterplan Area is identified as an allocation for approximately 100 dwellings within the Submission Version Local Plan (CHIG.R6). Whilst this site is not located within the Green Belt, the development of this area would involve the loss of public open space with no opportunities for on-site off-setting or mitigation. Although small areas of public space could be retained in the development, this will not be equivalent to the public open space lost. It is for this reason that the Limes Farm allocation was scored a double negative against the criteria 'capacity to improve access to open space' within Stage 6.2 'Site Suitability Assessment'.
- 2.6 We maintain that the consideration of smaller scale alternatives would have avoided the loss of open space in Chigwell. Whilst Site 2 was considered within the site selection process, we do not believe that accurate conclusions were drawn regarding the suitability of the site. It would appear that the desktop assessment of the site has led to its allocation for residential development to be omitted when, in reality, its former allocation was well and robustly justified.
- 2.7 As set out in our Hearing Statement submitted in response to Matter 5, Issue 1, Question 2, when the Council published Appendices B and C of the Site Selection Report in March 2018, it was evident that no site visit had been undertaken by the Council in relation to Site 2. The scoring of the site against a number of criteria within Stage 2 of the Site Selection Assessment (as outlined in Appendix B1.4.2 'Results of Stage 2') is incorrect and would have been evident at a site visit. The site (EFDC reference SR-0601) scores a red double negative against criteria 4.2 'Impact on Agricultural Land' and it is noted that "*development of the site would involve the loss of best and most versatile land (grades 1-3)*". Given that the Site is covered in hard standing, it could not sensibly be considered 'best and most versatile agricultural land'. The site has clearly been scored incorrectly against this particular criteria and this would have been plainly obvious to officers had a site visit been undertaken. Indeed, its size, shape and orientation also mean that it could not sensibly be worked for agriculture.
- 2.8 In light of the above, it is clear that Site 2 was wrongly rejected from the site selection process. Had it been correctly assessed and appropriately considered, the loss of significant areas of open space at Limes Farm could have been avoided with Site 2 providing a suitable alternative residential allocation in Chigwell.

Question 6. What effect would the development of the following sites have on the purposes of the Green Belt: CHIG.R1; R2; R4; AND R5? Has the supply of brownfield sites been exhausted, including the potential for conversion of larger dwellings?

- 2.9 The development of the following sites, CHIG.R1; R2; R4; and R5, would result in amendments to the Green Belt and thus a loss of Green Belt land in Chigwell. Whilst we do not consider the development of Green Belt land in this instance to be inappropriate given the exhaustion of the supply of brownfield sites in the District, we maintain that there is poor quality Green Belt land which should have been properly considered in the site selection process. Site 2, for example, whilst located within the Green Belt, is covered in hardstanding and

surrounded by development and is therefore considered to be poor quality land in comparison to the above allocations. We contend that the allocation of Site 2 would likely have less of an effect on the purposes of the Green Belt in comparison to the above allocations.