

Carter Jonas

MATTER 4 HEARING STATEMENT

Epping Forest District Council Local Plan Examination

SUBMITTED ON BEHALF OF LONDON SQUARE DEVELOPMENTS

January 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. 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 Draft Local Plan and Carter Jonas will attend the hearing sessions most relevant to Site 2 on behalf of London Square's behalf
- 1.5 This statement outline's London Square's comments in respect of Matter 4.

2 MATTER 4 – THE SPATIAL STRATEGY/ DISTRIBUTION OF DEVELOPMENT

2.1 We respond to the specific issues arising in relation to Matter 4 below:

Issue 4: Is the distribution of development justified in respect of the need for, and approach to, Green Belt release?

Question 1, Part A) How do the specific development needs of the District weigh against the importance given to Green Belt protection?

2.2 The NPPF (2018) notes at Appendix 1 that in examining the submission of Local Plans, those submitted on or before 24 January 2019 should be considered in the context of the previous Framework. Therefore the NPPF (2012) is referenced in this Statement.

2.3 Paragraph 47 of the NPPF (2012) explains that: *“To boost significantly the supply of housing, local planning authorities should:*

- *use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period...”*

2.4 The former PPG associated with the assessment of housing need notes at Paragraph 001 Reference ID: 2a-001-20140306 that:

- *“the assessment of housing and economic development needs includes the Strategic Housing Market Assessment requirement as set out in the National Planning Policy Framework”.*

2.5 For the period 2011-2033, the Strategic Housing Market Assessment (July 2017) found the OAN for the HMA as a whole to be 51,700 additional homes.

2.6 The Submission Version Local Plan (December 2017) sets out the approach to housing across the HMA in Table 2.1 ‘Housing Distribution’. The table explains that a total of 51,100 net new homes will be planned for across the HMA within 2011-2033. In particular, within Epping Forest District Council a total of 11,400 net new dwellings have been planned for within the same timeframe.

2.7 In consideration of the above, it is apparent that the number of homes planned for within the HMA as a whole, and in particular within the Epping Forest District, as set out in the Submission Version Local Plan (December 2017), do not meet OAN as outlined within the Strategic Housing Market Assessment (July 2017). There is therefore a clear requirement for the Council to allocate more land for housing in order to help meet the development needs of the District and the HMA as a whole.

- 2.8 Epping Forest as a District however is largely rural and over 92% of the land within its administrative area is currently designated as being in the Metropolitan Green Belt. Whilst continuing to protect the Green Belt, the Council has acknowledged that there is very little land remaining in the District within the existing settlements that is not already developed. As such, in order to meet future needs, a further District-wide review of the Green Belt should be undertaken to identify the potential for future development.
- 2.9 London Square recognises the need to preserve the Green Belt, however it acknowledges that not all land classified as Green Belt contributes equally to its purposes and function. For instance Site 2, which is situated within the Green Belt, is itself covered by concrete or hardstanding and has been in use for a substantial period of time as a construction compound surrounded by hoardings, and therefore should be considered to be poor quality Green Belt land. We believe that the Council, as a priority, should consider the release of poor quality sites from the Green Belt in order to assist with meeting the development needs of the District, especially where these are well related to existing patterns of development.
- 2.10 Given the Government's objective to significantly boost the supply of new homes, we do not consider the development needs of the District to have been appropriately weighed up against the importance of Green Belt protection. We therefore do not believe that the distribution of development as set out in the Submission Version Local Plan is justified in respect of the need for, and approach to, Green Belt release. Clearly there are poor quality Green Belt sites (such as Site 2) which could be released to support housing need.

Question 1, Part B) What would be the consequences of not releasing Green Belt land to help meet development needs?

- 2.11 As set out in Question 1, Part A there is a clear need for the Council to allocate further land for housing in order to help meet development needs. There is very limited availability of brownfield land for development in the Epping Forest District, therefore a decision not to release Green Belt land, may ultimately result in much higher density development within existing settlements, which we do not believe to be appropriate in this outer London context.
- 2.12 More importantly, a decision not to release Green Belt land for development could potentially result in unmet housing needs within the Epping Forest District itself as well as the HMA as a whole. The PPG indicates *"if there is clear evidence that the needs cannot be met locally, it will be necessary to consider how needs might be met in adjoining areas in accordance with the duty to cooperate"*. Given the duty to cooperate, if Green Belt is applied as a fundamental constraint, this would have the effect of forcing Epping Forest District's unmet needs into Districts beyond the Metropolitan Green Belt. There is at present no evidence of how this might operate.

Question 2) Are the changes proposed to the Green Belt boundary informed by a robust assessment of the contribution made by individual sites to the purpose of the Green Belt (EB74A-B; and EB705A-B)? How were the findings of the Green Belt Review weighed in the balance with other planning considerations in the site selection process?

- 2.13 In response to the first part of this question, we do not consider that the changes proposed to the Green Belt boundary have been informed by a robust assessment of the contribution made by individual sites to the purposes of the Green Belt.
- 2.14 The Stage 1 Green Belt Review concludes that Site 2, which is identified as being within the wider Parcel 'DRS-035' (Land North, West and East of Chigwell), makes a relatively strong/ strong contribution to the Green Belt. In particular, it is suggested that the broader parcel (of which Site 2 forms a tiny and peripheral part) prevents unrestricted sprawl of large built-up areas, and assists in safeguarding the countryside from encroachment.
- 2.15 In the Stage 2 Green Belt Review, Site 2 is identified as being located within the narrower sub-Parcel '035.7'. The report concludes that the smaller parcel (of which Site 2 still forms a very small and peripheral part) makes a moderate contribution to preventing unrestricted sprawl of large built-up areas, and makes a strong contribution to preventing neighbouring towns from merging and assisting in safeguarding the countryside from encroachment. The Review therefore assesses the resultant harm to the Green Belt purposes to be very high if the parcel is released from the Green Belt. We do not however, consider this conclusion to be valid for Site 2 since it makes up only a very small part of Parcel '035.7' and has been grouped with land that displays very different characteristics. The Site is bounded on all of its three sides by development; the south western and north western boundaries are adjacent to the residential accommodation associated with Bramble Close (which is part of a continuous ribbon of development from Chigwell Village to the south), the eastern boundary adjacent to Grange Farm Lane is also adjacent to existing residential development and the tip of the triangular shaped subject site reaches the High Road with the development associated with Chigwell County Primary School beyond. These features do not provide a rural setting for the site and therefore it is considered that the development of the Site would not result in encroachment into the countryside. Thus conclusions relating to the parcel's Green Belt purposes do not, in our view, apply to Site 2. A site visit will immediately confirm this to be the case.
- 2.16 Green Belt Stage 2 sub-parcel '035.8' is located on the opposite side of the High Road to the subject site and covers the area of land including Chigwell County Primary School. The total area of sub-parcel 035.8 is 27.97 hectares. Whilst vastly different in size to sub-Parcel '035.7' (which is 175.63 hectares), '035.8' displays similarities in terms of form of landscape; specifically Site 2 is not dissimilar to that of '035.8' where the Green Belt boundary is now proposed to be amended to remove the County Primary School. Given these similarities as well as the small size of the subject site which is contiguous with the southern boundary of sub-Parcel '035.7', we believe the most appropriate action would be for the Council to adjust the Green Belt boundary to remove Site 2.

2.17 Therefore, when the Site is assessed against the five purposes of the Green Belt (as set out in paragraph 80 of the NPPF 2012, the proper conclusions to be drawn are that:

- The development of the Site 2 would not result in the unrestricted sprawl of large built-up areas. Put simply, the site is a small well-contained site within a small settlement. It is contained by the wider built parameters of the settlement and would deliver new housing to support the local community. It would not result in unrestricted sprawl nor is it located adjacent to a large built up area. Therefore, the development of the site would not harm this purpose;
- The development of Site 2 would not result in neighbouring towns merging into one another. Since the site is small and is bounded by development on two of its three sides, its development would not result in any merging of towns. As such, the development of the site would not harm this purpose;
- The development of Site 2 would reduce pressure on the need to release more sensitive sites for development. It is surrounded to the north and west by urbanised features and its development would not encroach into the open countryside. The majority of the site itself is covered by concrete or hardstanding and has been in use for a substantial period of time as a construction compound surrounded by hoardings. It is acknowledged by the Parish Council that the site is considered to "make no effective contribution to the Green Belt". Furthermore, it is very apparent from any aerial inspection that the Green Belt in reality starts from the eastern side of Grange Farm Lane. As such, the development of the Site would play a significantly less harmful role when compared to alternative sites identified in the emerging Local Plan;
- The development of Site 2 would not damage the aim of preserving the setting and special character of historic towns. The settlement of Chigwell is not a town and the development of the site would assist in protecting the setting and special character of other historic towns (such as Epping) by reducing the quantum of development that needs to be identified within or adjoining them; and,
- The development of Site 2 would assist in the future viability and vitality of Chigwell, in particular by providing a site which would be particularly well-suited for the development of smaller units. Its contribution to urban regeneration would be limited, but the need for Green Belt releases to identify sufficient land for housing growth is established in the Local Plan. As such it is incumbent on the Council to maximise the opportunities available.

2.18 This assessment confirms that Site 2, when objectively assessed against the five purposes of the Green Belt, plays a very limited role. As such, the decision to remove the proposed allocation of the site in the current submission version of the Local Plan is not justified in the context of its role in the Green Belt. A plan showing the removal of Site 2 from the Green Belt by extending the existing defined built up area of Chigwell slightly to the north and west is attached at **Appendix 1**.

2.19 In terms of the second part of the question, i.e. 'how were the findings of the Green Belt Review weighed in the balance with other planning considerations in the site selection process?', clearly in circumstances where

the submission version of the Local Plan does not meet the OAN outlined in the SHMA 2017, low quality Green Belt sites such as Site 2 could plainly assist with housing land supply. It is not considered that these two issues have been balanced in the consideration process; with Green Belt protection being prioritised, even where this is not justified, as in the case of Site 2.

APPENDIX 1: CHIGWELL AMENDED GREEN BELT BOUNDARY



M11

Roding Lane

Chigwell Rise

Chester Road

Lee Grove

B170

Brook Rise

Brook Way

Great Owl Road

Barnaby Way

Dickers Rise

Chigwell

High Road

A123

Roding Lane

High Mead

Parklands

Meadow Way

Daleside Gardens

Countdown Drive

A113

High Road

High Road

High Road

50 m