

Epping Forest Local Plan Examination

Matter 15 – Places and Sites

Examination Statement by Nexus Planning on behalf of St Congar Provincial

1. These statements have been prepared by Nexus Planning on behalf of St Congar Provincial.
2. St Congar Provincial control an omission site known as land at Old Farm, Chigwell (the site), which has been promoted for housing. Our response to relevant matters, issues and questions are set out below.

Policy P7: Chigwell

Site Specific Matters 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?

3. No, we do not consider CHIG.R6 to be justified having regard to its impact on open space provision.
4. As detailed within our Matter 5 Statement, Appendix 2 of the Open Space Strategy (EB703) sets out a quantitative analysis of open space provision on a settlement by settlement basis and across the District as a whole. This identifies significant shortfalls in open space provision across the District and that this will worsen over the plan period.
5. Paragraph 73 of the NPPF acknowledges that access to high quality open spaces can make an important contribution to the health and well-being of communities. Furthermore, paragraph 74 is clear that existing open space should not be built on unless: (1) there is surplus provision; (2) the loss can be replaced by equivalent or better provision in a suitable location; or (3) the development is for alternative sports and recreation provision.
6. In respect of Chigwell, the Open Space Strategy is clear that it suffers from existing shortfalls in open space provision across all areas other than Natural and Semi-Natural Greenspace, a situation which will worsen over the plan period. This is illustrated below (using the Council's figures):

Open Space Typology	Current Deficit/Oversupply	Requirement by 2033
Amenity Greenspace	-3.46ha	-4.31ha
Public Parks and Gardens	-11.07ha	-12.1ha
Facilities for Children and Young People	-2.38ha	-3.63ha
Natural and Semi-Natural Greenspace	+26.01ha	+23.47ha
Allotments	-2.02ha	-2.3ha

7. The Council's Infrastructure Delivery Plan (EB1101B) in Table 8.10 (page 37-42) identifies that these deficits in open space have an 'essential' priority and that it will be addressed through "developer contributions (S106) / grant funding". However, there is no evidence to demonstrate how the funds

will be used to address this substantial shortfall and importantly where, particularly having regard to the accessibility standards set out in Table 3.2 of the Open Space Strategy.

8. In respect of CHIG.R6 itself, this includes existing Amenity Greenspace, for which there is a substantial shortfall within Chigwell. The Council's Site Selection Report (EB805N) suggests that there will be a temporary loss of Amenity Greenspace but assumes re-provision (nothing to address the shortfall). However, there is no evidence to demonstrate how the Amenity Greenspace will be re-provided alongside a net increase in 100 new homes. Furthermore, the policy wording does not expressly require re-provision, neither does the Site Specific Requirements in Appendix 6 of the EFDLP.
9. Having regard to the above, CHIG.R6 is contrary to national policy, not justified and accordingly not sound.

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?

10. We have been unable to locate any reference within the Council's Site Selection Report to CHIG.R4. The Council helpfully provided a Site Selection Diagram in support of Matter 5 (ED26), which is clear that EB805P identifies the sites for allocation but we can find no reference to this site. The same is true of EB805L and EB805N, which precede the final stage in the site selection process.
11. Given the above, it cannot be concluded that CHIG.R4 is sound, having regard to paragraph 182 of the NPPF as it fails the following tests:
 - **Justified** - in the absence of any evidence to support the draft allocation, it cannot be proven to be the most appropriate strategy, when considered against reasonable alternatives;
 - **Effective** – in the absence of any evidence to support the draft allocation, it cannot be considered to be deliverable; and
 - **Consistent with national policy** – the lack of any evidence for the site fails to demonstrate that the necessary exceptional circumstances exist for the release of the site from the Green Belt.