
MANOR FARM STABLES, MOTT STREET, LOUGHTON, ESSEX IG10 4AP

DEMOLITION OF EXISTING BUILDINGS AND CONSTRUCTION OF 5 DWELLINGS AND ASSOCIATED AMENITY SPACE, PARKING AND LANDSCAPING.

**PLANNING STATEMENT WRITTEN BY STEPHEN HAYHURST MA, MRTPI.
Amended by JEREMY POYSER MCIAT APRIL 2019**



1.0 BACKGROUND

Site Description

1.1 The application site lies on the north western side of Mott Street village. The vehicular access from Mott Street is between the large detached house at Manor Farmhouse and three neighbouring detached houses: Oak Manor, Manor Farm Barn and The Grange.

1.2 The site consists of a range of stables buildings, barns, storage containers and hard standings sited to the east of the garden of Manor Farmhouse and to the north of the garden of The Grange.

1.3 In total Mott Street village contains about 30 or so dwellings and a primary school. The village and application site occupy raised ground to the east of the Lee Valley and the application site has a modest slope from south east to north west.

1.4 The application site has an area of 0.643ha and the main part has a width of 96m and a depth of 67m.

1.5 The site is presently an active livery yard with approximate 24 self-contained stable units and tack rooms.

1.6 A track towards the eastern side of the site links Mott Street with Avey Lane to the north.

1.7 The applicant Mr & Mrs Evans have owned Manor Farm and the stable yard since 1981. They are aged 76 and 78 respectively and are now unable to operate the yard themselves without outside assistance as Mrs Evans is now in need of full-time care. In its current form the stable business does not generate enough income to be able to futureproof the maintenance of the trees, hedges and paddocks within the site. This project will provide the funds to be able to be

able to do this thus protecting the Green Belt. It is also in need of major refurbishment and many of the buildings need replacing. It would be hard to justify the major investment required because of competition from other more modern facilities and from other sites operating unlawfully on a commercial basis. There has also been a general reduction in the demand for stabling facilities, as evidenced by recent closures elsewhere in the locality. Given their ages the applicant and his wife could not expect to see a return on a major investment within a reasonable period. Therefore, they have decided that their best option is to redevelop the site for much needed housing.

2.0 DESCRIPTION OF PROPOSALS

2.1 The existing equestrian use of the application site would cease, the stable buildings and barn will be demolished, and the associated metal storage containers and concrete hardstandings removed.

2.2 Two 2 bedroom bungalows will be built on the south eastern edge of the site (see plots 4&5 on the proposed site layout plans).

2.3 To the north-west plots 1-3 will be 2 x 3 bedroom and 1 x 4 bedroom dwellings, the upper floors of which would be significantly concealed within the roof space.

2.4 Using 'cut and fill' techniques plots 1-3 will be built slightly into the slope of the land to reduce their visual impact.

2.5 The development would be in the form of an enclosed courtyard style reminiscent of a model farm and the proposed dwellings would have a traditional rural vernacular design with pitched, tiled roofs, gables and dormers and traditional materials.

2.6 Each dwelling will have two parking spaces with a further five visitor spaces provided, in accordance with Council's adopted parking standards.

2.7 A proposal for 5 x 4 bed detached houses was the subject of a pre-application enquiry last year and the planning officer's response was received by email on 20 April 2018.

2.8 After several consultation meetings with the Senior Planning Officer the applicant arrived at the site layout as previously submitted.

2.8 Application no. EPF/3187/18, was made to Epping Forest District Council, in December 2018, for 2 x Two bedroom Bungalows, 2 x Three Bedroom Houses and

2 x Four Bedroom Houses. This application was to be considered by the Planning Committee on the 10th April 2019. The Planning Officer's recommendation to the committee was for refusal based upon the impact upon the Green Belt due to the replacement volume being more than the existing built volume on the site. The applicant, Mr Evans decided to withdraw the application and to re-submit with this revised application which now resolves this matter.

3.0 PLANNING ISSUES

3.1 This planning statement is structured to address the following questions: -

- What is the current housing need in the District, is this being adequately met and to what extent would the proposed development meet that need?
- Is this a high quality design?
- What would be the impact of the development on the Green Belt?
- Would the proposal be a sustainable development?

4.0 MEETING HOUSING NEEDS

Rectifying the Drastic Shortfall in the Supply of Housing

4.1 The Council admits that it can only identify a 1.35 years' supply of housing land. This is in the context of a Government requirement to identify a five years' supply.

4.2 Paragraph 67 of NPPF2 says: -

"Planning policies should identify a supply of ... specific, deliverable sites for years one to five of the plan period."

4.3 According to NPPF2: -

"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."

4.4 Thus the Council cannot currently consider any major development site as 'deliverable', nor should sites without planning permission be considered deliverable unless allocated for housing in an adopted Local Plan.

4.5 The Submission Version Local Plan (SVLP) includes detailed proposals to meet the District's objectively assessed housing needs during the period 2012 – 2032.

4.6 However the most significant contributions to meeting that need will come from larger strategic sites. These sites require significant investment in infrastructure and detailed master planning before any new houses can be completed on site. They are also dependent on the LP being adopted.

4.7 Even medium sized sites present difficult infrastructure issues, with the added complication of having to plan for meeting affordable housing requirements.

4.8 Although there is some limited scope for granting planning permission for allocated small sites before the LP is adopted the Council is finding that this is not straightforward, with threats of legal challenge having the potential to significantly delay some of these.

4.9 Therefore in the short term the Council's best chance of adding to its housing supply is by swiftly approving small policy compliant sites, such as the brownfield site the subject of this application.

4.10 This application site is made by a willing owner/developer, is in a suitable location for housing, and is subject to no significant infrastructural constraints. Granting planning permission for this site together with other sites of a similar size and nature will help boost the Council's five years' housing land supply and help defer pressure for the release and development of other larger and less appropriate sites.

Providing a Suitable Housing Mix

4.11 The Council's pre-application response letter said: -

"Policy H1 of the [SVLP] requires new developments to include a range of house types and sizes to address local need and there is more need in the District for 2 and 3 bed dwellings than for 4 bed units..."

4.12 The proposed mix of 2 x 2 bed, 2 x 3 bed and 1 x 4 bed dwellings will be in accordance with this requirement.

5.0 HIGH QUALITY DESIGN

5.1 Section 12 of NPPF2 advocates high quality design (paragraphs 124-132).

5.2 Policy DM9 of the SVLP sets out general criteria for achieving and measuring the quality of design.

5.3 The pre-application proposal for 5 large detached houses received the following response:-

"The main concern is whether a suitable design of development appropriate to the nature of the area can be achieved, that would not be harmful to the character and visual amenity of the area. Given the change in levels the fall of the land from the fronting residential development and the screening available I am of the view that a discrete development could be achieved here, however I feel that the suggested layout of 5 detached houses in a cul de-sac with large gardens would not be appropriate here and that a design that perhaps mimics a traditional farmyard or model farm with a cluster of buildings with a central courtyard and a variety of built form may be a better way forward."

5.4 The revised scheme submitted with this application has adhered to this suggestion by proposing a courtyard style development reminiscent of the style of a model farm and includes a variety of built forms. Two bungalows would occupy the south-eastern side of the site facing towards the centre of a partially enclosed symmetrical courtyard. Plot 2 would be barn-like in appearance and our preference would be for weatherboarded elevations. Attached either side would be single storey carports of traditional cart lodge design. Plots 1 & 3 would occupy the south-western and north-eastern returns of the courtyard and would be slightly

subservient to plot 2 and would be reminiscent of smaller scale, brick agricultural buildings (such as a granaries, farm workshops etc).

5.5 The development would be set into the gentle slope of the land, so that the ridge heights of plots 1-3 would be lower than those of the bungalows at plots 4 & 5. Any long distance views from the north-east would be against the backdrop of the existing large dwellings to the south and south east of the site (Oak Manor, Manor Farm Barn and The Grange). Native tree and hedgerow planting to the outer site boundaries and within the courtyard would soften and screen the buildings and create the discrete development that the pre-application advice thought was achievable.

5.6 The layout would have regard to the framework of local routes and maximise connectivity by incorporating links to the paddocks to the north-west and forest land to the north east including access to the public right of way network (PROW 211).

5.7 A high quality of amenities would be provided for the occupiers of the development especially in terms of sunlight, daylight, privacy and private amenity space provision.

5.8 I therefore consider that SVLP policy DM9 would be complied with.

5.9 Policy DM10 requires compliance with design standards specific to residential development. In respect of these: -

- The internal space standards of the National Prescribed Space Standards would be exceeded (room sizes are given on the submitted plans).
- Ground floor access to amenity space would be achieved for all dwellings.
- Enhanced provision for green infrastructure is provided.

5.10 Therefore I consider that the development would be a high quality design in accordance with NPPF2 and the relevant SVLP policies.

6.0 IMPACT ON THE OPENNESS AND PURPOSES OF THE GREEN BELT

6.1 The pre-application response accepted that the application site is previously developed land. This PDL includes not only the stables buildings and ancillary buildings and structures, but also related hardstandings, parking areas, external storage areas, metal storage containers and paddocks.

6.2 Paragraph 145 of NPPF2 says the redevelopment of previously developed sites is not inappropriate development provided it would not have a greater impact on the openness of the Green Belt than the existing development. There is no formula given for deciding whether a development has more or less impact on the openness of the Green Belt, and it is in the final analysis a matter of planning judgement. The previous matter of volume has now been addressed and this revised proposal is now under the volume of the existing development.

6.3 The Volume of the existing development is as follows: -

- Barn, stables & secure storage containers = 3207.96m³

6.4 The Volume of the proposed development is as follows: -

- Volume of five houses = 3097.00m³

6.5 The proposed development would therefore result in a reduction of 129m³.

A breakdown of this is shown on drawing 1627/11.

6.6 In her pre-application response the planning officer expressed the view that the storage containers at the site could not be considered to be permanent buildings.

6.7 However the impact of the containers would be the same as the impact of a permanent building of the same size. The containers have been on site for 18-20 years and are therefore immune from Council enforcement action. Each container has a particular use pertinent to the stable business and these uses are indicated on the terrain survey. The containers are solid, hard, metal lumps, which have as much impact on the openness of the Green Belt as any permanent building of similar size, and therefore should be included in any assessment of the impact of the existing and proposed development.

6.8 The proposed single storey bungalow at plots 4 and 5 would reflect the low height of the stable buildings and, even though plots 1-3 include first floor accommodation, this is largely within the roof space and the use of cut and fill techniques would ensure that the overall height of the development is kept reasonably low.

6.9 The outer extent of the proposed dwellings would not extend as far north eastwards as the north eastern edge of the site will be defined by the edge of the existing ménage and the proposed site will be within the lines defined by the built form of the existing stable buildings. The existing paddocks, which are used for schooling and exercising the horses kept in the adjoining stables, are also part of the previously developed land, and the proposed gardens would extend no further north westward than these.

6.10 The dwelling at plot 1 would be roughly on the site of the barn on the south-western side of the application site, which is the tallest existing building at the site, and all the proposed dwellings would be lower than this.

6.11 Also relevant is the decision at Pipers Farm, Lippitts Hill (EPF/1169/18). Here planning permission for granted for a fourth large dwelling to replace existing equestrian buildings even though this was to be sited beyond the footprint of the existing buildings in open countryside. One justification for this was that it was also proposed to remove a floodlit ménage from the open part of the site, in much the same way that it is proposed to move the floodlit ménage at Manor Farm.

6.12 If this planning application were refused the applicant would have to consider alternatives, the most likely of which would be to invest in the replacement of the existing buildings, the replacement of metal containers with buildings and the addition of new facilities, such as an indoor riding school, to give the business better prospects of long-term profitability. Such new facilities and buildings would themselves have an impact on the Green Belt, so when assessing the proposals, I would urge you not only to compare the proposed development with the existing, but also with what is likely to materialise if the site remains in equestrian use.

6.13 Therefore taking into account: the relationship between the existing site and buildings and existing development in the village; the proposed reduction in the volume of development; the relatively low height of the proposed dwellings; the effect of the slope of the site in helping conceal the dwellings; the high quality design; the backdrop of the existing buildings in Mott Street; the precedent set by the development at Pipers Farm; and the likelihood of further equestrian development at the site if the current use continues, I consider that the development would not have a greater impact on the openness of the Green Belt and would not therefore be an inappropriate development.

7.0 SUSTAINABILITY

7.1 The pre application response says: -

"The location is far from ideal in terms of sustainability and it is likely that any new residents will be highly reliant on the car for almost all trips, however at present, whilst the council has identified how a 5 year housing land supply can be achieved, we do not yet have an adopted plan and the lack of housing land supply may be sufficient to outweigh the harm from the development. All efforts should be made to ensure that the development is as sustainable as possible in other ways, such as the provision of electric car charging points, use of brown water and passive heating to help offset this issue."

7.2 This advice recognises the fact that in the absence of a five years' housing land supply the single issue of sustainability is not sufficient grounds for refusal, which is what the inspector said in allowing the North Weald Golf Club appeal for 20 flats (at Rayley Lane, North Weald Bassett, Epping CM16 6AR – application Ref: EPF/0183/15 and appeal Ref: APP/J1535/W/15/3134332).

National Planning Policy & Guidance

7.3 There is clearly some tension between Green Belt policies which permit the redevelopment of brownfield sites in the countryside (NPPF2 paragraph 145) and non-Green Belt policies which discourage "isolated new homes" in the countryside (NPPF2 paragraph 79).

7.4 However, in *Braintree District Council v Secretary of State for Communities and Local Government & Ors* [2018] EWCA Civ 610 the Court rejected a claim that a development at Blackmore End would be isolated as "there are a number of dwellings nearby" and that to be isolated a site would need to be "separate or remote from a settlement". In the case of the Manor Farm it is clear that there are a number of other dwellings nearby and the proposed development site is adjacent to the edge of the existing settlement. Therefore it is not 'isolated'.

7.5 Paragraph 103 of NPPF2 advocates a different approach in urban and rural areas: -

*"The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. **However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.**"* [My emphasis].

7.6 This advice is consistent with the advice in Planning Practice Guidance: -

*"The National Planning Policy Framework also recognises that different sustainable transport policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions **will vary from urban to rural areas.**"* (My emphasis - see paragraph: 001 Reference ID: 50-001-20160519).

7.7 Paragraph 78 of NPPF2 says: -

*"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. **Where there are groups of smaller settlements, development in one village may support services in a village nearby.**"* (My emphasis].

7.8 High Beech is precisely the type of disaggregated settlement to which this advice should apply. By allowing development at Mott Street this will not only help support services in Mott Street (such as the primary school), it will also help to

support other local services in the rest of High Beech, such as local pubs and other small local businesses.

7.9 In any case, in the context of the whole rural area the application site is not particularly remote.

7.10 There is a considerable concentration of dwellings and businesses in the Mott Street Area and High Beech is in a part of the District right on the edge of the Greater London conurbation. Waltham Abbey and the M25 are about 3km to the north-west and Loughton and the M11 are about the same distance to the south-east.

7.11 The Duke of Wellington and The Owl public houses (in Wellington Hill and Lippitts Hill) are both 1km from the site and High Beech Primary School is about 350 metres away.

7.12 Planning permissions have also been granted for residential development on a number of similar sites in the High Beech area where existing equestrian businesses have closed. In all these cases the redevelopment of a relatively remote site was regarded as acceptable partly because of the reduction in the volume of traffic that would result, including in particular the elimination of large horse transporters and delivery lorries on the narrow rural roads.

7.13 These other planning permissions include:-

Carlton House Stables Lippitts Hill Waltham Abbey Essex IG10 4AL

7.14 EPF/0910/17 – Demolition of existing stables and outdoor menage, removal of mobile home, erection of 2 x 4 bedroom detached chalet style dwellings (Plots 1 & 2) and 3 bedroom bungalow (Plot 3) and associated parking and landscaping. Approved 24 May 2017.

7.15 EPF/1350/18 - Demolition of existing stables and outdoor menage and construction of 4 x 3 bedroom detached chalet style dwellings and associated parking and landscaping. (Resolved to grant subject to S106 Agreement - 21 August 2018).

7.16 It was acknowledged that a 63% reduction in vehicle movements would result.

Pine Lodge Riding Centre Lippitts Hill Loughton Essex IG10 4AL

7.17 EPF/2853/14 - Demolition of existing buildings, improvements to existing vehicular access, erection of five detached houses, associated garages and boundary fences and landscaping. Approved 11 February 2015.

7.18 EPF/3253/17 Demolition of existing buildings, improvements to existing vehicular access, erection of five detached houses, associated garages and boundary fences and landscaping (renewal of previous approval). Approved 5 February 2018.

7.19 It was acknowledged that a 50% reduction in vehicle movements would result.

Pipers Farm, Lippitts Hill Waltham Abbey Essex IG10 4AL

7.20 EPF/3229/15 - Demolition of existing equestrian buildings, construction of 2 no. new dwellings and conversion of the existing stable, tack room & groom's quarters to form 3 bedroomed dwelling and associated works. Approved 15 April 2016.

7.21 EPF/1169/18 - Demolition of existing buildings and construction of 3 new detached dwellings with associated works. Resolved to grant subject to S106 agreement - 14 November 2018.

7.22 An approximately 60% reduction in vehicle movements was acknowledged.

Fairmead, Church Road, High Beech, Loughton, Essex IG10 4AJ

7.23 EPF/2903/15 - Demolition of outbuildings (and mobile home) associated with stables and cattery and erection of two dwellings. Approved 11 January 2016.

7.24 In granting planning permission the Council stated: "In sustainability terms consideration must be had with regards to the existing use, which results in a large number of traffic movements to the site...".

Three Horseshoes Farm, Church Road, Waltham Abbey, Essex IG10 4AJ

7.25 EPF/0733/17 - Demolition of existing stables buildings and construction of 2 x 4 bedroom contemporary style dwellings, associated parking and landscaping.

7.26 Other reasons why the proposals at Manor Farm will be a sustainable development include: -

- By re-developing existing buildings, the proposed development would help conserve open countryside and re-use an existing resource.
- Grey water recycling for re-use in toilets and for watering gardens would reduce water consumption.
- A sustainable drainage system would reduce surface water run off towards green field runoff rates and thus help to reduce flood risk.
- The proposed development would increase the amount of soft landscaping at the site, including tree and shrub planting and increase the amount of wildlife habitat.

- The dwellings would provide a high level of insulation (in excess of Building Regs standards) in order to minimise energy consumption.
- Electric charging points would be provided for each dwelling.
- Ground source heat pumps would be installed to further reduce energy requirements.
- It can be seen from the submitted transport statement that there will be a significant reduction in transport movements per day. This Stable Yard is different to others in the Forest, in that, Riders that wish to exercise their horses in the Forest need to ride on Mott Street to get access to it. So, in addition, the removal of this stable yard will also remove the horses that may cause a traffic hazard in Mott Street.

7.27 I therefore consider that the application site is not a remote or isolated location. It would accord with National Policy and Guidance which advocates a different approach to sustainability in urban and rural areas. It would result in a significant decrease in traffic movements like the many other recent examples of similar developments approved by the Council in the High Beech area, and other practical measures would be taken to warrant its status as a sustainable development.

8.0 OTHER CONSIDERATIONS

Drainage

8.1 A flood risk assessment and drainage statement has been submitted with the application.

8.2 This identifies that the site is in Flood Zone 1 and is therefore at a low risk of flooding.

8.3 Finished floor levels are stipulated to ensure that none of the dwellings would be at risk of surface water flooding from the watercourse which runs in culvert through the site.

8.4 As required by EFDC land drainage team plot 4 would be located a minimum of 3m from the culverted watercourse.

8.5 Attenuation would be provided in the form of lined permeable paving and a swale to restrict the surface water runoff from the site to as close to greenfield runoff rates as possible.

8.6 The proposals in the flood risk assessment and drainage statement would result in a sustainable drainage strategy.

8.7 It is also proposed to connect to an existing foul sewer, which crosses the site.

Ecology

8.8 An ecological impact assessment has been submitted with the application.

8.9 This includes recommendations for the carrying out of any works in the vicinity of trees at the site.

8.10 There are habitats for nesting birds at the site including within some of the existing buildings proposed for demolition.

8.11 Recommendations are made to ensure that no harm would be caused to nesting birds.

8.12 Proposals for new nesting boxes are made in order to help mitigate for the loss of existing nesting sites.

8.13 No direct evidence of bats roosting in buildings or trees at the site was found although there was considered to be some potential for this.

8.14 A number of recommendations are made to try to ensure that the potential value of the site to bats is maintained and enhanced, including by the provision of new roosting features and bat friendly planting.

8.15 Similarly some potential habitat for badgers was found but no direct evidence.

8.16 A precautionary approach is therefore recommended to ensure that if badgers are found to be present that they are unharmed by the proposed development.

8.17 There is also suitable habitat for hedgehogs at the site and recommendations are also made to ensure that this is protected and that commuting animals are able to wander freely.

8.18 In addition the extensive native species tree and hedge planting proposed at the site would ensure that there is a net gain in biodiversity in accordance with SVLP policy DM1 and paragraph 170 of NPPF2.

Trees

8.19 An arboricultural impact report is submitted with the application.

8.20 It states that no works to trees would be required to accommodate the development and no trees would need to be removed.

8.22 Protective fencing would be installed to prevent unnecessary access into the root protection areas of existing trees during construction.

8.23 Policy DM5 of the SVLP would be complied with.

9.0 CONCLUSIONS

9.1 The applicant and his wife are elderly and cannot justify the investment that will be required to upgrade their commercial stables yard to a standard commensurate with their competitors, given the shrinking demand for such facilities in the area.

9.2 There is acknowledged to be a pressing need for new housing in the District and the development of small sites such as this could make a valuable contribution towards meeting that need in the short term.

9.3 The proposed development would be a high quality design, with a traditional rural character and appearance in accordance with Section 12 of NPPF2 and policy DM9 of the SVLP and in line with the planning officer's pre-application design advice.

9.4 Taking into account: the relationship between the existing site and buildings and existing development in the village; the proposed reduction in the volume of development; the relatively low height of the proposed dwellings; the effect of the slope of the site in helping conceal the dwellings; the high quality design; the backdrop of the existing buildings in Mott Street; the precedent set by the approved scheme at Pipers Farm; and the likelihood of further equestrian development at the site if the current use continues, the development would not have a greater impact on the openness of the Green Belt and would not therefore be an inappropriate development.

9.5 There are no grounds for refusing the application on sustainability grounds, given the recent appeal decision at North Weald Golf Club; the high court decision in the *Braintree* case; the policy statements in paragraphs 78 & 103 of NPPF2; the PPG guidance at paragraph 001 reference ID: 50-001-20160519; the expected reduction in traffic as a result of the development; the proximity of the site to two local pubs and the village primary school; the five examples of similar

equestrian redevelopments approved in the locality; and the other sustainable development measures proposed by the applicant.

9.6 A sustainable drainage system would ensure that flood risk is not increased elsewhere in accordance with paragraph 163 of NPPF2 and SVLP policy DM16. Existing trees would be protected in accordance with policy DM5 of the SVLP. New native species landscaping, and other ecological mitigation measures would produce a net gain in biodiversity in accordance with paragraph 170 of NPPF2 and SVLP policy DM1.

9.7 For all these reasons I consider that this planning application should be approved.

PHOTOGRAPHS



SITE ACCESS



THE ACCESS DRIVE



BUILDING 2 with BUILDING 3 in BACKGROUND



THE YARD



REAR OF BUILDING 1



THE YARD