

Epping Forest District Council Representations to the Draft Local Plan Consultation 2016 (Regulation 18)

Stakeholder ID	1972	Name	W.	Poulton	Chelsteen Homes Limited
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Method	Letter
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Date	9/12/2016
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Letter or Email Response:

EPPING FOREST DISTRICT DRAFT LOCAL PLAN CONSULTATION 2016 LAND TO THE REAR OF 57A AND 57B FYFIELD ROAD, CHIPPING ONGAR - SITE REFERENCE SR-0102 We write on behalf of our clients, **...Redacted...**, in respect of the above consultation. This letter should be read in connection with the completed Draft Local Plan consultation questionnaire response. Our clients have an interest in the above referenced site and wish to offer the following comments in support of the proposed site allocation SR-0102 in the context of Draft Policies P 4, SP 2 and SP 5. Site Location The site is located on the northern fringes of Chipping Ongar. This is sustainable settlement which currently has a reasonable range of services and facilities providing for retail, leisure, health, education and employment opportunities. The site is logically allocated, being adjacent to built-up development to the east (houses along Fyfield Road) and the south (Ongar Health Centre and residential development). It is contained to the north by a wooded area and to the west by a residential garden (with tall boundary hedgerow) beyond which is a public footpath and allotments. The site therefore has clear defensible boundaries, is physically well contained and enjoys screening from surrounding buildings or vegetation. The site is accessed from the B184, one of the main approach roads in to the settlement. The B184 heads north to Fyfield, The Rodings and Great Dunmow or south (through High Street) on to Brentwood via the A128. Only 400m south of the site is a junction with the A414 which is the main route to the large settlements of Chelmsford and Harlow (and also Epping, via the B181). Site SR-0102 is well located in relation to local facilities. It lies immediately adjacent the Ongar Health Centre (to the south) and opposite the Leisure Centre and the Ongar Academy (under construction) lying to the east at The Gables. Also at The Gables lie The Essex Innovation and Technology Centre, a Youth Centre and an Adult Community Learning facility. Within 200m to the south there is a convenience store and two restaurants. Approximately 400m south is a filling station which includes a shop. Whilst there are shops within 200m-400m, the majority of local shops lie in High Street. These mainly lie within 1.0km to 1.5km walking distance. At 1.0km, a Tesco Express store is found. At 1.5km lies a Post Office. In between (or close to) these two buildings are found other facilities including various shops, pubs, a Sainsbury's supermarket, bank, pharmacy, restaurants, library and churches. These are all within walking or cycling distance of Site SR-0102. Nearby open space recreation and play facilities are found within 300m south-west off St. Peter's Avenue (where a parade of shops also exists) and within 1km south at Jubilee Park. The Ongar Primary School lies 700m south west. The Chipping Ongar Primary School lies at the southern end of the settlement, 2km distant. Both have been identified by the council with some capacity for growth. There are employment opportunities in and around the settlement, including inter alia those businesses in the High Street area and at the Fyfield Business and Research Park (which could expand employment opportunities). However, the settlement has no major scale business parks or industrial areas. Inevitably

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out- commuting occurs and to this end the availability of public transport links is important. Chipping Ongar is served by good public transport. Within 200m of the site, along the B184, there are Bus Stops for services to and from the High Street as well as other larger settlements such as Chelmsford and Brentwood. Within approximately 800m-850m walking distance additional bus services are available to the larger settlements of Harlow and Epping. Various village destinations in the area are also served by the buses. Chelmsford and Harlow provide significant levels of facilities, especially employment opportunities. They also have their own railway stations serving London. At Epping, there is the Central Line tube station with frequent services in to London. From the above it will be appreciated that Chipping Ongar is a sustainable settlement which will support a reasonable level of expansion. Given the location of Site Allocation SR-0102, it is physically well placed in relation to the local services and facilities available. In turn this makes it reasonably likely that the residents generated by the development would, through their potential custom, enhance the viability of the same, as well as add to local vitality of the settlement eg clubs, societies, etc. Given the above:

- The general growth of Chipping Ongar as proposed under Draft Local Plan Policy SP 2. The policy seeks inter alia to allocate around 600 units to Chipping Ongar. It would meet the social and economic objectives of national planning policy set out in the NPPF.
- The specific allocation of site SR-0102 proposed in the Draft Local Plan under Draft Policy P 4 is supported.
- To this end, Draft Policy SP 5, which proposes to amend the Green Belt boundary to allow for site allocation SR-0102, is also supported.

Delivery of Site SR-0102 - Draft Policy P 4 Chipping Ongar, A) ii) Our clients wish to give additional confidence to the LPA by demonstrating that the site is suitable, available and achievable, being able to deliver housing, in particular taking in to account how various constraints will be addressed and what opportunities may arise. Account has been taken of the Site Selection report September 2016 (and other/background documents) by Arup, which the council has used to inform the Draft Local Plan.

a) Land ownership
The developer of the site will be **...Redacted...**, a long standing housing developer. The company have a good track record of delivering high quality medium scale housing schemes in the area, including the Epping Forest District. A recent example was the development of a scheme for 14 no. high quality apartments at Centre Drive, Epping, close to the Epping Underground Station. They fully intend to develop the site for a high quality residential development having agreed terms for an option with the sole landowner, who has made the site available to them. On such basis, there will be no impediments in terms of land ownership constraints to **...Redacted...** developing this available site.

b) Access
The Site Suitability Assessment noted that Access to the site is 'significantly constrained'. This observation has partly resulted in the unit allocation being reduced to 16 dwellings (see also comments on yield, below). **...Redacted...** has commissioned an initial access review from its consultant highway engineers (Ardent) in June 2016. The site has a 12.5m frontage with Fyfield Road (B184) to the east boundary. Any new access would lie near to the access road which currently serves the Ongar Health Centre (OHC) to the south and would need to be designed to take this in to account. Ardent advise that the current adopted (2005) Essex Design Guide (EDG) stipulates that a "Type 6 Minor Access" can serve up to 50 dwellings in a cul-de-sac, with this being a 5.8m wide shared surface no longer than 150m. ECC has commenced work on a new EDG. The emerging standards include wider carriageway widths than the present adopted EDG. A "Type F Minor Access" (current equivalent Type 6) has a 6m wide shared surface carriageway no longer than 125m, where presently 150m. The consultant engineers therefore recommend that the site access road is formed by such 6m wide shared surface - an EDG "Type F Minor Access" as this can serve 50 dwellings. A bespoke access arrangement has been prepared by Ardent and is due to be discussed with ECC Highways. It shows a 6m wide shared surface access from Fyfield Road. Junction visibility splays measuring 2.4m x 50m have been agreed with ECC Highways for the proposed new access for the new secondary school (Academy) opposite and so similar splays to serve the site are thought appropriate. These can be accommodated within highway land and thus there is no other third party land required for the access. This is also the conclusion of the Arup Site Suitability Assessment report (ref Appendix B1.4.2) which states 'Access to the site can be created within landholding adjacent to the highway' and goes on to state in its Qualitative Assessment that 'although the SLAA identified access as a possible constraint, following further consideration it was judged that access could be provided from Fyfield Road'. The LPA should draw confidence from both our client's own engineers and Arup's Assessment. The site allocation of approximately 16 units should therefore be treated as a minimum in highway terms at this stage given the 'potential' for the access to serve 50 dwellings via the "Type F Minor Access Road" recommended by Ardent. An alternative option is to share the use of the access serving the OHC, allowing the site to be entered via its southern boundary. A new footway would be provided to the north side of the existing access road, within the site, making this safer for pedestrians who currently have to walk along the access road. Another potential benefit of this approach would be to provide some overspill parking for the OHC on the subject site (in addition to housing) because indiscriminate parking takes place along the OHC access road,

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despite the existence of yellow line restrictions along it. Ongar Town Council has also commented that part of the site could be used for parking for the OHC. Therefore our clients may be prepared to consider such alternative access option although note that this would rely on the positive outcome of any discussions with the NHS who own the access.

c) Yield The site measures 0.8 ha which would yield 24 units (at a standard density of 30dph) or 36 units (using the stated baseline density of 45dph stated in the Indicative Site Capacity Assessment). The Draft Local Plan allocates the site however for approximately 16 homes. The scale of the allocation is reduced for 2 reasons, including access and to respect the local setting. In respect of the access issue, the Arup's Site Deliverability Assessment has applied a 35% reduction to the baseline density of 45dph to take account of 'likely difficulties securing access to this site'. It is not clear what the basis for this assertion is or whether professional highway input has informed this notion. However, should Ardent's recommended access proposal be supported by ECC Highways (see comments above), this would theoretically allow for up to 50 dwellings to be served off it. In such circumstance, the 35% reduction to the dph would not be warranted. We note the conclusion in Arup report 'Decisions on Residential Sites for Allocation in Chipping Ongar' (Appendix B1.6.5) that 'No on-site restrictions or constraints have been identified and there are no other constraints that have been judged as insurmountable.' A further 25% reduction on density was applied in Arup's Site Deliverability Assessment. In justification the report notes: 'Site located on edge of the settlement and predominantly low-density setting character of surrounding development likely to require reduction in density to mitigate possible negative impacts'. However, our own assessment indicates a mixed density adjacent to the site, as follows:

- Abigail Court (residential complex to the south) - 28 units on 0.293ha = 95.6dph (high density)
- Finch Court (residential complex to the south) - 20 units on 0.165ha = 121.2dph (high density)
- 57a - 75 (odds only) Fyfield Road (houses to east) - 11 units on 0.512ha = 21.5dph (medium density)

This evidence would indicate that a 25% density restriction applied for the reasons stated in the Arup Report is unwarranted. Our view is that a reasonable allocation of this site would be for approximately 24 dwelling, based on a density of 30dph.

d) Impact on Agricultural Land Arup's Site Suitability report states that 'Development would involve the loss of the best and most versatile agricultural land (grades 1-3)'. However, it will be clear from a site inspection that the site is not actively used for agriculture as it comprises overgrown scrubland. It is understood that the site may have once been used as an orchard but this clearly would have been many years ago. A distinction should be drawn between the proper value to agriculture of this site and other potential housing allocations which are in active use as farmland. As a small parcel of land it has little prospect of use as a viable agricultural concern. Also, it is separated from the arable land further north by an intervening woodland strip which is part of the title of a residential property along Fyfield Road. To this extent the site could not be added to any existing agricultural concern. Accordingly, any negative score against this criterion should be reviewed as the agricultural land classification of the site cannot realistically be deemed problematic.

e) Green Infrastructure/Settlement Character Sensitivity Arup's Site Deliverability Assessment states in respect of the Green Infrastructure criterion that 'Development of SR-0102 would result in the loss of non-designated woodland'. This is inaccurate. The site is not a 'woodland' as it is principally overgrown scrub. The site can be distinguished in physical characteristics from the strip of wooded land lying adjacent to and beyond the site's northern boundary, which is in different ownership. Arup's Site Suitability report states under 'Settlement Character Sensitivity' that 'Development could detract from the existing settlement character'. However, the site is in no meaningful use. It is fenced off from the adjacent development to the south creating a negative relationship with the settlement. As stated in our comments on 'Yield' there are high density uses to the south and medium density uses to the east. The suggested density of 30 dph with a yield of 24 units should be possible without undue impact upon local character via a two storey development. This would not be out of keeping with the adjacent storey heights of residential properties at Abigail Court, Finch Court and Fyfield Road. We also note that the Ongar Health Centre is a commercial building of three storeys. In the circumstances we believe that development of the site will not have a negative impact on the settlement character. There is a wooded area to the north of the site which will contain built forms. Of relevance is the comment in Arup's Site Suitability Assessment report (under 'Landscape Sensitivity') that 'The relevant site character context is urban and development is unlikely to adversely affect the wider landscape character'.

f) Distance to Local Amenities Arup's Site Suitability report states that the 'site is more than 4000m from the nearest secondary school'. However, a new Academy is currently under construction to the east side of Fyfield Road, Chipping Ongar. Accordingly, the negative score against this criterion should not apply. Our clients would be pleased to discuss further details of the site with officers and agree a statement of common ground to inform the next stages of the Plan. The site is discrete and is not one of the three large estates proposed in Chipping Ongar. To this extent it can be

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delivered it a short timescale. We trust these comments will be taken in to account and look forward to future consultation as the Plan emerges. Yours faithfully, CNLoon Chris Loon BSc (Hons), Dip TP, MRTPI Director