

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

Stakeholder ID 3325      Name      Sworders on  
Behalf of Mr G  
Watt

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Method      Letter

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Date      12/12/2016

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### Letter or Email Response:

Question 6: The Draft Local Plan has identified our draft strategy for meeting the housing and employment needs up to 2033. We have identified sites for housing which are suitable and available and can be delivered over the next 17 years. Please tick the area/s you wish to respond to: Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sewardstonebury, Sheering and Stapleford Abbots (Draft Policy P12) Do you agree with proposed sites? No  
Please explain your reasons for this 1.0 INTRODUCTION 1.1 We support the proposal to allocate 26 dwellings on site SR-0032 within Lower Sheering. However, we consider that given the shortfall in housing allocations in the current draft Plan, and given the level of facilities that we consider Lower Sheering should be judged as having access to (see our representation in response to question 2 of the questionnaire), that a further site should be allocated at Lower Sheering. 2.0 ADDITIONAL SITES 2.1 Attached at the end of this representation is a plan showing land submitted to the Local Plan process by the Watt Family, which is situated within SR-0313. The allocated site SR-0032 is within the ownership of the same family, and as such a joint approach to developing SR-0032 and all or part of SR-0313 could be undertaken. 2.2 We note that the Site Selection Report (SSR) has 'paused' the consideration of parcel SR-0313 given the interaction with, and timetabling of, the AECOM Harlow Strategic Sites Assessment. However, we note the conclusions set out at appendix B1.5.2, 'Results of Stage 3 Assessment for Residential Sites around Harlow', that, "In the SSM, SR-0313 scores well across most criteria. The site scores poorly in terms of landscape sensitivity and Green Belt but it was felt that these constraints could be overcome. The site should continue to be considered through the SSM. It was envisaged that the strategic sites work would be completed in Summer 2016, which would have enabled a comprehensive review of all sites around Harlow located within Epping Forest District to be undertaken. This was not possible and therefore the Council will undertake further work to assess this site following the Draft Plan consultation." 2.3 We support the conclusion that the constraints identified could be overcome. In regard to landscape impacts, within the Settlement Edge Landscape Sensitivity Study (SELSS) SR-0313 is located within landscape setting area 3 (see figure 7.4), which is assessed as having high landscape sensitivity, however setting area 3 covers a very large area, too large for it to be relied on as evidence for assessing the suitability of individual sites. The land put forward by the Watt Family (which is outlined on the plan attached at the end of this representation) is available in whole or any part, enabling the selection of those parts of the site which are least constrained in landscape terms. 2.4 We note within the SSR, a significant number of sites with a finding of high landscape sensitivity, as reported at 5.1 of the assessment proformas for Stage 2 (Appendix B1.4.2 'Results of Stage 2 Assessment) have been allocated for

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development, no doubt based on a common sense approach to interpreting the findings of the SELSS at site scale. 2.5 In terms of Green Belt, the stage 2 Green Belt review places the land promoted by the Watt Family within parcel 002.1. Again, as with the SELSS, this parcel covers a wide area which stretches beyond the land promoted, eastwards to beyond Quickbury Farm and southwards to Back Lane. The overall assessment for 002.1 presented at table 4.1 of the Stage 2 Green Belt Review is that the 'Summary of Harm' for 002.1 is 'high', and it remains 'high' when the parcel is assessed against three green belt purposes used by the SSR in testing site selection (figure 4.6 of the Stage 2 Green Belt Review). 2.6 As is the case with regard to landscape, we note that a number of sites situated within areas with the same 'summary of harm' rating of 'high' have been allocated within the draft Plan, and once again, a consideration of discrete parts of the land put forward by the Watt Family would mitigate against harm to the Green Belt. 2.7 A number of options have been put forward on the plan attached at the end of this representation. The entirety of the land put forward is outlined in red, with a number of options for smaller releases within this area outlined in green. 2.8 The development of that part of the site outlined in 'option 2' on the plan attached at the end of this representation would (in conjunction with the release of SR-0032) deliver development with strong boundaries to three sides of development. A new wooded landscape belt could be established along the southern boundary. 2.9 It is notable that paragraph 85, bullet 6 of the NPPF states that when defining boundaries, Local Authorities should, "define boundaries clearly, using physical features that are readily recognizable and likely to be permanent." There is no requirement to use existing physical features; new physical features can be established (such as for example roads, woodlands and strong tree belts). Allocation policies within Local Plans can request these features are established and can also request that these are established prior to the commencement of development; firstly to enable them to become established, and secondly to ensure delivery. The use of new physical features to define green belt boundaries is an approach being utilised by other Green Belt authorities within their submission draft Plans, including North Hertfordshire and Welwyn Hatfield. 2.10 Moreover, the establishment of new hedgerows and woodland areas can assist in restoring landscape character features that have been lost from the countryside during the post-war period. This loss is noted to be the case for the land to the east of Lower Sheering, which the SELSS records as having suffered post 1950s boundary loss. 2.11 Given the above, it would also be possible to produce an iteration on option 2, namely option 1, which releases land directly adjacent to SR-0032 for a smaller scale of development that does not extend up the hill. A new dense hedgerow/woodland belt would be established on the outer boundary as a permanent, readily recognizable feature. 2.12 A further option set out on the plan attached at the end of this representation, option 3, would be to release land further south as a separate parcel, with access via Lower Sheering Road. This parcel has strong boundaries, with a watercourse to the north and dense hedges/tree belts to other boundaries, aside from a small gap to the eastern boundary, which could be straightforwardly addressed with new landscaping. 3.0 INFORMATION HELD BY EFDC CONCERNING SR-0313 3.1 We were concerned that the information held in regard to the site as provided to us at the developer meetings for sites not proposed for allocation, entitled 'Summary of assessment process and current status in relation to Epping Forest District Draft Local Plan' contains a number of inaccuracies. • The information concerning the Call for Sites is incorrect. The site was originally submitted in response to the Issues and Options (Community Choices) Consultation in 2012. • The site boundary does not reflect our client's ownership - we appreciate however this may be the manner in which the information is held, but we highlight it in any case. The land promoted is outlined on the plan attached at the end of this representation (option 1 is the entirety of the land). • The SLAA summary indicates ownership unknown. • A developer survey was returned for the land outlined on the attached plan at the end of this representation in summer 2016, and this is acknowledged on the form, however under 'Summary note' it indicates that a survey response was not received. 3.2 In addition to the above, we have raised concerns regarding the in principle approach to the assessment of Lower Sheering in terms of access to facilities within our response to question 2. Consequently we do not agree with a number of the distance to facilities scores outlined within the Site Suitability Assessment provided at Appendix B1.4.2 of the Site Selection Report. 3.3 Beyond this, we note that the site scores negatively in regard to the Impact on Settlement Character, owing to the scale of SR-0313. Clearly, a reduced site would significantly mitigate against any impacts.

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