

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

Stakeholder ID	3087	Name	Gavin Morrison	joint plot application with Mr Padfield
Method	Letter			
Date	19/1/2017			

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Letter or Email Response:

RE: Response to Draft Local Plan Questionnaire re: A ppeal against failure to include Morrison paddock and adjoining Padfield land in Chipping Ongar, as a site for development within the District Plan. Epping Forest DraftLocalPlan: ChippingOngar Site reference: SR-0457 Parcel: 024.1
 Arrup Response Ref: 0220 We attended a Consultation Event for the District Plan i n Epping on Friday, 11th November, where we met the planning officer, Sarah King. We appreciate the magnitude of the work already undertaken by EFDC planning department, and the many complex issues for consideration . We discussed with Sarah King, the failure of our site to be included as a proposed area for development. We have examined all the information now available to us and wish our site to be reconsidered as we have strong evidence to support our proposal.

Oursite, which is scrubland, behind the Stag Pub, is of no use to us and any sort of sale would greatly contribute to our being able to support our vulnerable, adult son with special needs. Below, we have selected sections of your consultation documents (quoted in red), and made our response to each of them for you to consider anew. They principally relate to the fact that our site lies just within the Green Belt (parcel 024. 1). 1) Considering, Chapter 3 Strategic Policies of the Local Plan Alternative Options pg.27 Expansion to the south and east of the settlement. These options would significantly harm the Green Belt, compromise the historic setting of Ongar, and are locations which are more sensitive i n landscape terms. (Rejerenccd from Dra.ft local plan.) Our site has been excluded because an embargo has been placed on the parcel by EFDC. The above statement is all that appears in the Site Selection Report. There is no real evidence given to substantiate this or why one area of Green Belt is deemed more sensitive than another and is flawed and not transparent. The decision to unilaterally exclude all parcels to the east of Ongar, contradicts many of your stated processes, and has resulted in your giving no further consideration to the details of our plot. It is a severely flawed application and does not stand up to logical scrutiny and could be challenged at the highest level. Site selections should be on the individual merits listed in the criteria.

In Appendix A, Residential and Employment Site Selection Methodology: Stage 2 Qualitative and Quantitative Assessment (p.12) 4.16 The criteria are grouped into the following categories: *

- environmental and heritage designations and biodiversity *
- Value to Green Belt *
- Accessibility by public transport to services. *
- Efficient use of land *
- Landscape and townscape impact *
- Physical site constraints and site conditions

Our site performs extremely

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well by all these criteria and is better than the selected sites for all the reasons that are given and will follow in this document. It is not close to Ongar Castle and it is Green Belt of least value. It does not seem that Officers have visited our site to assess it fully. On pg. 21 of the EFDLP Report on Site Selection it says, 'Table 2.7 provides a summary of the indicative net capacity of the 152 sites broken down by settlement and by the 6 categories identified'. (for Chipping Ongar) Green Belt of least value 0 Green Belt of greater value 676 Green Belt of highest value 5. J9

As our site is Green Belt of least value and you have not taken forward any sites at all in this category, your site selection process has not complied with your own stated aims.:

II) Considering, Site Selection Methodology Appendix A pg. 8 4.2 The consideration of sites needs to demonstrate that all reasonable alternatives have been assessed consistently and thoroughly. As our site, which we will demonstrate performs extremely highly against the criteria, has been discounted, there has not been a thorough assessment of sites.

III) Considering, Positive Use of Land in the Green Belt (Photographed from a document at the Consultation Event) 24. Almost all land within the District's Green Belt, is positively used for agriculture or recreation. 25. To this extent the District Council, together with partners, is meeting the NPPF requirement (para 81) to plan positively to enhance the use of the Green Belt land. (Referenced from Draft Local Plan documents) The Morrison paddock is a landlocked piece of basically, scrub land, unsuitable for either agricultural or recreational use. It has no purpose and is basically, a 'back site' or 'in-fill site'. It makes no positive contribution to the Green Belt. The fairly recent development of houses at Hunter's Chase which backs onto the Morrison paddock on the north border, were not even interested in the possibility of purchasing land to annex adjacent to their gardens when we offered it for sale 3 years ago. The failure to include the Morrison paddock as a site for development means that the District Council is failing to meet the NPPF requirement of planning positively to enhance the use of the Green Belt.

IV) Considering, Chapter 3 Alternative Options pg. 37 3.54 The approach to the allocation of sites has been to take each settlement and consider the most appropriate sites in accordance with the (following) order of priority. 5. Green Belt Sites on the edge of settlements a. Of least value to the Green Belt if the land meets other suitable criteria for development. b. Of greater value to the Green Belt if the land meets other suitable criteria for development. c. Of most value to the Green Belt if the land meets other criteria for development. 6. Agricultural land. The Morrison paddock comes into category 5a) of least value to the Green Belt, as it has no purpose, and is not agricultural land. Other sites in Chipping Ongar (for example, SR-0184, SR-0185, SR-0186) have been identified for development even though they are agricultural land forming part of a scenic vista, yet that land, according to your criteria, should be considered less appropriate than the Morrison site.

V) Considering, Chapter 3 Strategic Policies of Local Plan Green Belt and District Open Land. Pg 45 3.84 "not to include land which is necessary to keep permanently open. (Referenced from Draft local plan documents) The Morrison paddock, as a 'back fill' and an 'in fill' site, with no purpose, is not essential Green Belt to keep permanently open. It also has no purpose.:

VI) Considering, Chapter 3 pg. 45 3.84 *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. (Reference) from draft local plan The Green Belt boundary in Marden Ash/ South Ongar as currently drawn in your local plan draft follows an irregular path around our scrub land. There is a clear natural line that could be drawn for the Green Belt, along the edge of the southern fence of 'Dyers' on the Stanford Rivers Road, and Orchard Cottage and the White House, leading off the A128 Brentwood Road. This would separate the already built environment between the Stanford Rivers Road and the A128 Brentwood road, from the open fields. It would include the Morrison/Padfield in fill site, with no degradation of Green Belt.

VII) Considering the following three referenced paragraphs, Chapter 5 Alternative Options pg. 142 Expansions to the south and the east of the settlement These options would significantly harm the Green Belt, compromise the historic setting of Ongar, and are locations which are more sensitive in landscape terms. (Referenced from draft local plan) IN ADDITION Chapter 3 pg. 45 SP5 Green Belt and District Open Land: 3JQ Green Belt serves 5 purposes: ... 'to assist in safeguarding the countryside from encroachment ALSO Stage 3 Assessment (Photographed from a document at the Consultation Event) Chipping Ongar: Parcel 024.1 (72.20 Ha) Purpose 3 (Green Belt) Considered STRONG for this parcel: The parcel contains little development with the exception of some detached dwellings (primarily, some converted farms and barns) and back gardens in the north of the parcel adjacent to the southern settlement of Chipping Ongar.... The landscape is open and inter-visible with the wider countryside, and thus if the parcel was to be developed this may be perceived as encroachment... It is considered that the parcel performs strongly in safeguarding the countryside from encroachment (reference from draft local plan) The Morrison paddock is bordered by many large and

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mature trees and is a 'back fill' site to the comparatively recent Hunter's Chase development, built on the gardens of The Stag pub (previously designated Green Belt) and The White House (not converted farms and barns as stated). It is also an 'in fill' site between these buildings. It is unattractive and does not constitute part of the open countryside that constitutes the rest of the parcel. It has houses on 3 sides and the access road in the fourth side. That corner of the parcel is quite developed with a number of houses, including the development at Hunter's Chase, which was built on land that was previously designated Green Belt. Building on the Morrison paddock would not constitute encroachment on the wider countryside. The houses to the west of the Morrison paddock with large gardens and trees, would be shielded from any development. The Hunter's Chase houses would have an improved outlook.

Other areas that it is proposed to develop in Chipping Ongar, directly encroach on the countryside, way beyond the existing delineation of houses, which the Morrison site does not.:

VIII) Considering, Purpose 4 To preserve the setting and special character of historic towns. MODERATE ... There are some listed buildings at the southern gateway to the town indicating that there may be a limited relationship between the landscape within the parcel and the wider setting of the town (Referenced from Draft local plan documents) Any new development on the Morrison paddock would be hidden from the listed buildings on Stanford Rivers Road. IX) Considering: Draft Local Plan How we will achieve this Housing (p. 30) *...to make provision for objectively assessed market and affordable housing. Draft Policy H3 Rural Exceptions pg 60 A. Planning permission may be granted for small-scale 'affordable' housing schemes within settlements. as an exception to the normal policy of restraint'. (Referenced from Draft local plan documents) The Morrison paddock could be used to develop affordable or social housing. X) Considering Vision and Aspirations for Chipping Ongar What you told us pg. 137 5.70 Concerns were raised about the proposed growth locations identified for the settlement in the community Choices Consultation, due to traffic congestion and impacts on the landscape, Green Belt, heritage assets and school places Traffic through the town would not be substantially increased with additional development of the small in-fill site (Morrison Paddock and Padfield plot) as a part of parcel 024.1. Modest traffic is needed as there is parking in the town and small businesses are reliant on passing trade for a vibrant town centre. On that side of town, it will also mean that anyone wishing to take advantage of the new Elizabeth Line station at Shenfield, will not have to drive through the town to get there, which will not increase traffic flow through the town. As already stated, the Morrison site does not contribute to the landscape, nor does it form part of any scenic vista. It is surrounded by large, mature trees. Land formerly in the Green Belt, to which the Morrison paddock forms a 'back fill' site, has already been developed as Hunter's Chase. The Morrison paddock is hidden from view from the listed buildings on Stanford Rivers Road so there is no harm to these heritage assets. XI) Considering 5.71 What are the strengths and weaknesses to address in Chipping Ongar? pg. 137 *there are several areas of flood risk within and around the settlement associated with location between the River Roding and Crispey Brook. (Reference from draft local plan) The Morrison site is not close to the River Roding or Crispey Brook and is not a flood risk. the town's XII) Considering Pg. 137 5.74 The Council has considered the possible spatial options to accommodate new homes at Chipping Ongar and concluded that there are 3 suitable spatial options: *...expansion of the settlement to the west - although less favored. ...this location provides opportunity for expansion of the settlement while minimizing harm to the character of the settlement and surrounding landscape. (Referenced from draft local plan) The sites to the south and west of the Four Wantz Roundabout, (SR 00671 and SR 0120) cut into useful Green Belt in a way that the Morrison site does not. These sites are not 'back fill' or 'in fill'. This would be a significant development of highly visible houses and of course it contributes hugely to the alteration of the character of the historic settlement and the landscape itself, as it is highly visible and will hugely increase traffic at the roundabout. Sites SR-0184, SR-0185 and SR-0186, which are adjacent to High Ongar Road, are both sites which cut into agricultural Green Belt. All the existing houses will lose their attractive vista, detracting from their houses in a way which the Morrison paddock would not, as it is screened by large, mature trees. If there is truly sufficient allocation of sites in the existing draft, then it would serve the countryside better to substitute the Morrison/Padfield paddocks for the site SR-0184 to 0186. The same number of houses would be built. We believe, however that future demand in the home counties is so great that the Morrison/Padfield plots could be beneficially added to the local plan. XIII) Considering: Chapter 3 pg. 45 SP 5 Green Belt and District Open Land. 3.83 ...authorities should consider the Green Belt boundaries, having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan period. 3.84 When defining boundaries, local planning authorities should: *not include land which it is unnecessary to keep open *satisfy themselves that Green Belt boundaries will not need to be altered at the end of the Development Plan period. of the

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3.92 *Further to the SLAA..... This approach seeks to protect the most high value Green Belt land wherever possible...alterations to the Green Belt boundaries are necessary. (Reference from local plan documents)
The Morrison paddock is not high value Green Belt as it is scrub land, without purpose, is an 'in fill' and a 'back fill' site, and is not part of any scenic vista. At some point, it will inevitably be deemed suitable for development. There is a precedent at Hunter's Chase, a highly visible development of houses that the Morrison paddock is situated behind. The Green Belt could by-pass the Morrison paddock without any detriment to the parcel (024.1). In conclusion, we were desperately disappointed that our site was not included in the proposed Plan at this stage. We believe our paddock performs well against the criteria. This document has provided evidence that you have not undertaken assessment of the East of Ongar area in a logical or robust manner and have contradicted your own criteria, which I am now therefore challenging. I ask that the boundary be marginally redrawn and our plots (Morrison-Padfield) will now be included as a site for development.