

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

Stakeholder ID	3459	Name	John	Collins on behalf of Caring Homes	DHA Planning on behalf of Caring Homes
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Date	12/1/2017
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Letter or Email Response:

SUBMISSIONS IN RESPECT OF EPPING FOREST DISTRICT COUNCIL DRAFT LOCAL PLAN CONSULTATION ON BEHALF OF CARING HOMES FOR LAND AT HONEY LANE, WALTHAM ABBEY (ARUP SITE REFERENCE SR 0370) AND IN RESPECT OF PROPOSED POLICY IN RESPECT OF CARE HOME PROVISION. I refer to the Council's consultation on the draft Local Plan and set out below our submissions in this matter. Our main submissions relate to the non-inclusion of our clients site at Honey Lane, which is referred to in the Arup Assessment as site 370. We are firstly concerned that instead of being considered on its own merits, the Arup Assessment considers it as part of a much bigger land-holding. As a consequence we do not consider that the site has been fairly assessed "on its own merits". In addition it is our view that the site selection process has not been undertaken in a consistent or robust manner and in this respect set out below our comments on the site appraisal of Arup. For your advice our clients land appears to have been considered as part of site SR 0065. The land is identified as land south of Honey Lane, north of the M25 and west of Junction 26 of the M25. We firstly make reference to the Arup Assessment to confirm a number of important matters In respect of 1.1 we attach an ecological assessment that demonstrates that ecology should not be considered to be significantly impacted by the development of the site. This is at odds with the Arup assessment. There is no significant impact on internationally protected sites. Criteria 1.2 There is no impact on nationally protected sites. Criteria 1.3a The site is not located within or adjacent to Ancient Woodland. Criteria 1.3b We have produced a layout for the site which demonstrates that no Ancient or veteran trees would be impacted upon. Criteria 1.5 The attached ecology report demonstrates that the site can be developed with no impact on BAP priority species or habitats. Criteria 1.6 It was confirmed that the site has no effect as features and species could be retained or due to distance to local wildlife sites would remain unaffected. Criteria 1.7 Flood Risk: Arup correctly identified the site as being within Flood Zone 1. i.e. There is no flood risk. Criteria 1.8a Arup concluded that no affect is likely on historic assets due to the distance from the site. Criteria 1.8b Arup identified that there could be some archaeological interest. In this respect we would submit that such matters could be covered by archaeological testing and or watching brief which would be covered by condition. Please see related archaeology report for the site. Arup indicated that the site lies within an area which has been identified as being 'at risk' for air quality. We do not agree with this comment and in fact challenge it. Our site does not lie next to the M25 and is well separated from it. The site lies at much higher level than the M25 such that particulates would easily be dispersed. The site lies a significant distance back from the main road and dispersal of particulates from the site would be considered to be good. In any event mitigation measures could be put in place as set out in the Arup assessment. Criteria 2.1 In the assessment Arup conclude that the site is within the Green Belt

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where the level of harm caused by the release of the land for development would be low, or low-medium. We agree with this assessment. Distance to the nearest rail/tube station: Arup conclude on this point that the site is a reasonable distance being between 1km and 4km to the nearest rail or tube station. We must point out that there are good bus connections to the station and this is a matter that should be taken into account. Criteria 3.2 Arup conclude that the site is between 400m and 1km from a bus stop. This is within the normally accepted distance. Criteria 3.3 Arup conclude the site is within 1600 metres of an employment site/location. This is, in our view to take an overly simplistic view of employment locations. There are a number of significant employers located much closer than the 1600 metres stated and therefore we consider this filter has been incorrectly applied. There is an hotel, care facility and industrial sites within a few hundred metres. In addition our client's proposals for the site are of themselves high employment generators. We therefore conclude that this criteria should be reviewed. Criteria 3.4 The distance to local amenities is stated as between 1km and 4km in the Arup assessment. Chigwell station is less than 1.4 km away. Again good bus connections are in place to these locations and this is highly relevant. Criteria 3.7 It is stated that the site is between 1000 and 4000 metres from the nearest GP's surgery. Maynard Court Surgery is only 750m walk away, with 3 other surgeries within 2km; the Abbey surgery being only approximately 1350m distant. The Arup conclusion is therefore considered an inaccurate statement. Criteria 3.8 Access to strategic road network. In response to this Arup state that this is not applicable. It is not understood how this is the case when a connection to the M25 is a very short distance away. Criteria 4.1 The Arup comment is considered fair and reasonable. Criteria 4.2 Arup concluded that the development would involve the loss at best of the most versatile agricultural land (Grades 1/3). I am afraid this is an over simplification. The site is not connected to other agricultural land and represents a relatively small parcel of land where the other parcels are in separate ownership. It would therefore not function efficiently as part of a wider agricultural land holding. Criteria 4.3 Arup have confirmed that development of the site would not involve the loss of public open space. Criteria 5.1 We note that Arup agree that the site falls within an area of low landscape sensitivity where the characteristics of the landscape are resilient to change and able to absorb development without significant character change. It is our submission that this is a very significant matter in determining whether or not this site should be removed from the Green Belt and indeed how the site fairs against other Green Belt sites the Council are looking to take out of the Green Belt. A concern is that Arup's conclusion on this point is at odds with that regarding impact on the Green Belt. We consider it very significant that the point of access to our site already has lighting and a footway. In general the provision of such features can be considered highly urbanising. The fact that such features are already in place is therefore considered highly relevant in considering the sensitivity of the site to visual change. Criteria 5.2 Arup conclude that the development is unlikely to have an effect on landscape character. This fully endorses the point we have made above. We attach our own assessment of the landscape visibility of the site. Criteria 6.1 It is not understood how Arup conclude that there are topographical constraints. The site slopes gently. It is fairly level and there are no trees or other features within the site. We attach a topographic survey of the site to illustrate the point. Criteria 6.2a, 6.2b The site does not impede on gas or oil pipelines or powerlines. Criteria 6.3 The site does contain trees on the boundary, but the submitted layout has demonstrated that these would not be affected. The Arup report is therefore not correct. Criteria 6.4 Arup conclude that the site could be suitably accessed. Criteria 6.5 We attach a contamination assessment. This demonstrates that our client's site does not have such constraints. Criteria 6.6 We attach a Transport Assessment which demonstrates that the Highway can accommodate the development traffic generated by the clients proposed use. It will be seen from the above that due to Arup including our clients site in a much larger parcel, their assessment has resulted in negative conclusions that are not correct when our clients site is individually assessed. As a consequence we request that in order for our submission to be correctly assessed Arup are asked to consider all of the attached documents and to undertake an assessment for site 370 in isolation. In summary it is a site with low landscape sensitivity and one where there are no significant impacts arising from development. In our submission the site should therefore be removed from the Green belt and allocated for development. Our clients have applied for a care home and we ask for consideration to be made on that basis. To fail to do so would in our submission be contrary to the NPPF and in our view would make the Council's site selection process unsound. We place on record that we will be making detailed submissions in this respect at later stages of the plan process. From the above it is concluded that this site is of relatively low sensitivity for a Green Belt site, lies adjacent to other existing and current development sites, is connected by built development to the built up area of Waltham Abbey. Other matters and submissions - specifically in respect of the Council's approach to care home provision. In respect of figures 2.4 to 2.7 it is clear that the statistics as presented by the Council set out that the population breakdown and expected growth are such that there is a rapidly increasing 65+ age group. Work undertaken by Christie and Co. has

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demonstrated that there is an urgent need for care bed spaces. It is our view that the draft plan sets out inadequate policy to meet the housing needs of that particular sector. There is inadequate quantitative and qualitative assessment of needs for the elderly and those in need of care and respite care. This in our view means that the Council's identification of such has under-provided development sites, irrespective of the merits of each site. The attached assessment by Christie and Co. demonstrates that within a 10KM radius of Waltham Abbey, there is already an undersupply of 1016 bed-spaces. By 2026 this will have risen to 1785. This level of provision requires a significant area of land and we are concerned that the Council have not made adequate provision across the District. The Council's strategy should be based on a thorough assessment of each settlement. Without this the whole strategy would be flawed and considered unsound. Policy SP5 - Green Belt and District Open Land Any review of the Green Belt should be about whether the land identified as Green Belt actually serves any of the purposes of the Green Belt. Alongside this any removal of land from the Green Belt should follow appropriate landscape and visual impact assessment. It is our submission that the plan should assess the edges of settlements and identify that land which does not function as, or meet the objectives, of the Green Belt as set out in the NPPF. In short we submit that the Council' draft plan is not founded on an accurate, consistent or appropriate evidence base. We consider that our client's site should be re-assessed and that a more robust set of criteria should be used to determine which existing Green Belt sites should be considered appropriate for development. We ask the Council to re-assess its care provision and specifically re-assess our client's site as a site suitable for such provision. If you have any queries on any of the above matters please contact me as soon as possible Yours Faithfully, John Collins. * Attachments need uploading to Darzin - Archaeology Part 1, 2 & 3 as well as sustainability statement & site plan 9-2 RevE*

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