

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

Stakeholder ID	3061	Name	Jason	Robins	...Redacted...
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Letter or Email Response:

Response to Local Plan Draft Consultation Site ref: SR-0497: Land to the rear of Monks Hall, Abridge Road, Theydon Bois

1. Introduction 1.1 This submission is made on behalf of Mr Jason Robins ...Redacted... assisted by Mr David Robins as Chartered Surveyor. 1.2 Our submissions relate to an objection to Figure 5.17 (Site allocations for Theydon Bois: Drawing No. EFDC-DP-0015-Rev1 dated September 2016) as the identified areas for housing growth proposed at Theydon Bois does not extend to include a further logical urban extension to the east, specifically on Site ref: SR-0497: Land to the rear of Monks Hall, Abridge Road, Theydon Bois. 1.3 This submission is supported by the following: a) Appendix 1 includes a site location and ownership plan of the land in question illustrating the land that is the subject of this Regulation 18 representation. The subject land is fully within the control of ...Redacted... and is made available for development within this Local Plan period and beyond. 2. Response 2.1 Our response specifically relates to questions 2 and 6 of this consultation: "Q2. Do you agree with our approach to the distribution of new housing across Epping Forest District? (See Draft Policy SP 2, Chapter 3). Q6. Do you agree with the proposed sites in your area? (See Chapter 5) Do not feel that you have to comment on all of the areas." 2.2 We do not wish to comment specifically on questions 1, 3, 4, 5, 7, 8 and 9 of this consultation at this time but reserve judgement to comment further on such matters in the future as may be required. 2.3 Although we broadly agree with the proposed sites identified in Theydon Bois we feel it appropriate and acceptable that site ref: SR-0497 be seen as a logical extension to proposed allocation ref: SR-0026C in order to maximise the potential yield of such allocation. This will further assist the Council in meeting its identified full housing needs longer-term as well as minimising the loss of more sensitive and less well-contained Green Belt land elsewhere in the district as identified comprehensively by the Council's Green Belt Review Stage 2 report (2016) forming part of its Draft Local Plan evidence base as well as the more recent ARUP Site Selection Report highlighting that the development of this site would have a very low, low or medium level of harm to the Green Belt. 3. Representations 3.1 In light of the foregoing our submission to this Regulation 18 Local Plan consultation is set out under the following headings: The Spatial Strategy 3.2 We support the identification of Theydon Bois as a 'Large Village' within the settlement hierarchy set out in Figure 5.1 (Settlements in Epping Forest District). 3.3 We are concerned that Draft Policy SP2 proposes allocations for up to 360 dwellings in "small villages" which are locations that conflict with the "Core Principles" of the NPPF contained at paragraph 17 which highlights that local planning authorities should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. These villages include Coopersale, Fyfield, High Ongar, Lower Sheering, Roydon, and Stapleford Abbots. These are not sustainable locations for development of this scale. 3.4 It is our submission that these 360 dwellings should be redistributed to the towns and larger villages in accordance with the hierarchy set out in Figure 5.1 including a small proportion to Theydon Bois, reflecting the

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sustainability of such settlements. 3.5 The spatial strategy is also absent of any flexibility and contingency to address non-delivery or delay of larger allocations within the Local Plan. For example the Local Plan is centred around delivering 3,900 dwellings on the edge of Harlow under the duty to co-operate. However, the implications of Harlow's recent decision at their Special Council meeting on the 31st August 2016 to reject sites to the south and west of the town, falling within Epping Forest District, highlights the uncertainty of the delivery of 3,100 homes towards the Districts requirement of 11,400 dwellings as part of this plan, almost 28% of the total housing requirement. If these homes are not delivered the District Council will have a shortfall of 248 dwellings against its current requirement which is below the full Objectively Assessed Need (OAN) requirement. 3.6 The spatial strategy does not therefore give confidence and certainty that the full housing requirement will be delivered in this Plan period should there be delay or non-delivery of the land identified adjoining Harlow, or other key sites. The Local Plan should therefore seek to allocate additional land to provide a buffer as a safeguard against the potential for nondelivery or delay to land around Harlow. This will provide a strategy which seeks to meet the need in full. The subject site is well placed to assist in providing such buffer. Chapter 5 of the Draft Local Plan and Site Selection Report (2016) 3.7 Chapter 5 of the draft Local Plan sets out the Council's preferred approach to allocations in Theydon Bois and confirms that no allocation is made for development at site ref: SR-0497. 3.8 Following the publication of the Council's Site Selection Report (2016) undertaken by ARUP which has informed current proposed draft site allocations and includes consideration of our site we wish to comment further under the following sub-headings. However, it is important to note that we largely agree with the majority of the assessment for site ref: SR-0497 unless otherwise demonstrated below. Impact on Heritage Assets 3.9 We are fully aware of the existing heritage assets adjoining the site, namely the Grade II Listed Parsonage Farmhouse and associated barn at Monks Hall. We also acknowledge that such heritage assets would likely reduce the capacity/yield of the site by 5% to ensure an appropriate buffer between the heritage assets and their setting and any new development. In this regard it is important to highlight that the landowner/developer is committed to ensuring the heritage assets and their setting are adequately preserved as part of any new development proposal and where possible such assets are enhanced through any such proposal. Brownfield and Greenfield Land 3.10 We acknowledge that the site is predominantly classified as greenfield land which is not currently adjacent to an existing settlement. However, should adjacent site ref: SR-0026C be allocated for housing growth as an urban extension to Theydon Bois as currently proposed it would bring the village closer/adjacent to our site. This would mean our site would be well placed to act as a logical extension to the wider allocation and as a result would be well linked to the extended settlement of Theydon Bois with strong and sustainable links into the centre once the full allocation is fully constructed. Impact on Agricultural Land 3.11 Although development of the site would involve the loss of the best and most versatile agricultural land (grades 1-3) it is important to note that the land has not been farmed for many years. In any case the loss of such a small area of land for this purpose would be negligible and would not adversely impact on the availability of such higher grades of agricultural land for arable farming purposes more generally. Landscape Sensitivity 3.12 The Site Selection Report identifies that the site falls within an area of medium landscape sensitivity meaning the characteristics of the landscape are resilient to change and able to absorb development without significant character change. However, the Report adds that the key characteristics of the adjacent assessed landscape sensitivity zone extend to this site with the form and extent of any development having to be sensitive to the location to avoid potential adverse impact on the adjacent landscape character area. 3.13 We are aware of such landscape sensitivity and confirm that the site could deliver a yield of up to 31 dwellings without adversely impacting on such landscape interests given the topography within which it sits as well as the fact that the site is very well-contained from wider views which would be preserved and were possible enhanced as part of any future development proposal on the site. Settlement Character Sensitivity 3.14 The Site Selection Report identifies that development of the site could detract from the existing settlement character. The Report adds that the site is identified as a potential regeneration area and contains Grade II listed barn associated with Parsonage Farmhouse and that proposed development is higher than the low density dispersed housing nearby. However, it concludes that such an impact could be mitigated through sensitive design. 3.15 As outlined earlier within this representation should proposed site allocation ref: SR-0026C be formalised as we support, our site would act as a logical well-contained extension to it assisting in the Council meeting its OAN including any buffer as appropriate. Therefore, in connection with this proposed allocation the site would have a negligible impact on settlement character given its extent and relationship to proposed allocation site ref: SR-0026C which itself adjoins the existing village and has been deemed as appropriate by the Council in their current Local Plan growth strategy. Impact on Tree Preservation Order (TPO) 3.16 The Site Selection Report highlights that the intensity of site development would be constrained by the presence of protected trees either on or adjacent to the site. It adds

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that the protected trees on or adjacent to the site could be incorporated into the development proposed, subject to care in the layout, but would be likely to have a significant adverse impact on the suitability of the site for development. 3.17 We strongly disagree with such conclusions in this respect. The subject protected trees are located towards the boundaries of the site and could be adequately protected and incorporated within the final design of any such development proposal on the site. 4. Suggested amendments 4.1 The inclusion of site ref: SR-0497 in the Council's housing strategy for its new Local Plan would be justified alongside that of proposed allocation ref: SR-0026C as the most appropriate strategy for Theydon Bois when considered against the reasonable alternatives. In addition it is considered that the Local Plan must build in sufficient flexibility to make-up any likely shortfall in housing delivery identified by our representation. This will ultimately require the addition of further sites in the defined towns and large villages to ensure delivery of the minimum housing requirement. 4.2 Based on the foregoing it has been identified that the minimum changes necessary to make the Local Plan satisfy the tests of 'soundness' by being 'justified' and 'effective' require the inclusion of a greater number of allocated sites in the defined towns and large villages including Theydon Bois with site ref: SR-0497 well placed in this respect as a logical and well-contained extension to proposed allocation ref: SR-0026C. 4.3 It is submitted that the inclusion of such additional sites including site ref: SR-0497 will ensure that the draft Local Plan is ultimately found to be 'sound'. Therefore we request that the Council re-consider the case for allocation at Theydon Bois, in particular on land to the rear of Monks Hall, Abridge Road, Theydon Bois for at least 31 new homes.