

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

Stakeholder ID	3958	Name	Rachel Bryan on behalf of Kerr, Johnson, McKinney, Eales-White and Kerr.
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Date	9/12/2016
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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. Do you agree with the proposed sites in Chipping Ongar (Draft Policy P 4)? (please tick one box) Yes Please explain your reasons for this:

1.0 INTRODUCTION 1.1 This representation is made on behalf of the landowners of the majority of site SR-0067i (land to the west of Chipping Ongar). We support part i) of Draft Policy P4 which proposes to allocate the site for approximately 73 homes. 1.2 In addition to our support for the proposed allocation of site SR-0067i, we wish to make a few points of clarification, on behalf of the landowners. 2.0 OWNERSHIP 2.1 The majority of site SR-0067i is within the single ownership of REDACTED. However, it also includes a small amount of land to the east which is within separate ownership. Whilst the landowners have no objection to working with neighbouring owners, it is believed that the inclusion of this land is an error since no information regarding availability of this land is contained within the evidence base, including the Site Selection Report which assumes the entire site is within single ownership. 2.2 Please see attached plan showing that part of site SR-0067i owned by our clients outlined in red and additional land within the same ownership outlined in blue. For clarification, all of the land outlined in red and blue on the plan is available for development. 2.3 Assuming the site boundary is amended to the red line area to reflect the single ownership and availability, the site size would be 2.487 Ha which could comfortably accommodate 73 dwellings at a density of 30 dph. 2.4 Access to the site would be via the existing access onto the A414. It could also include footpath enhancements or new crossing facilities to improve access from both the site and the rest of the settlement to the primary school. Detailed access design can be provided as part of a planning application. 2.5 All comments below relating to "Site SR-0067i (land to the west of Chipping Ongar)" are made on behalf of relate to the land within our clients ownership, i.e. the red line area. 3.0 THE SITE 3.1 Chipping Ongar is a sustainable location for development, already benefiting from a broad range of services. The site is in a suitable location for development in an edge of settlement location which constitutes a logical extension. The site is disused pasture land and not in agricultural production. As such, development of the site will not result in loss of productive agricultural land. Development of the site could enhance the character of the area; it is currently disused land on an edge of settlement/semi-urban environment, being located adjacent to the A414 between existing development. Development of the site will have no adverse impact on significant or protected ecological sites. A site specific ecological appraisal can be undertaken prior to the submission

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of a planning application to ensure that there will be no impact on protected species. Access to the site is via the existing access off the A414 within a 30mph zone with adequate visibility. Detailed access design can be provided as part of a planning application. 3.2 In summary, it is a modest scheme which would lend itself to fast delivery, it is not agriculturally productive land and that it is a logical amendment to Green Belt boundary. 3.3 It is not clear whether this proposed allocation falls under the spatial option of expansion of the settlement to the north or to the west. Whilst it is described as “land to the west of Chipping Ongar” it forms part of the cluster of proposed allocations to the north and shares the “northern” characteristics of being in close proximity to the new secondary academy and the existing primary school and health facility. 4.0 GREEN BELT 4.1 It is entirely appropriate to alter the Green Belt boundary in order to release the site for development, and is in accordance with national policy. The National Planning Policy Framework (NPPF) states at paragraph 83 that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of a Local Plan. 4.2 Whilst it is acknowledged that housing need alone does constitute the exceptional circumstances necessary to release Green Belt, housing need combined with local conditions means that it is simply the only option remaining to meet these needs. Insufficient land outside the Green Belt exists to meet the development needs of the district. 4.3 The development strategy presented in Draft Policy SP 2 maximises opportunities for development around Harlow and also in locations within the existing settlements before considering a limited release of Green Belt land, using a sequential approach. Density has also been maximised in order to limit the extent of Green Belt release. This is a sound approach and in accordance with the NPPF. 4.4 Site SR-0067i is appropriate for Green Belt release; it is in a sustainable location and will help to deliver the housing needs of the district. 4.5 The five purposes of including land within Green Belts are set out within paragraph 80 of the NPPF and are reproduced below followed by our comments: 1. To check the unrestricted sprawl of large built-up areas Chipping Ongar cannot be considered to be a large built up area. According to the Green Belt Review Stage 2, site SR-0067i lies within parcel 013.3 and makes no contribution to this purpose. As such, its development will have a nil effect in respect of this purpose of including land in the Green Belt. 2. To prevent neighbouring towns from merging into one another There are no distinct settlements to the west of Ongar which would merge with the town in the event of the development of this site. The closest settlement of any size to the west of Ongar is North Weald which lies some three to four miles away. According to the Green Belt Review Stage 2, site SR-0067i makes no contribution to this purpose and development of the site will not lead to the coalescence of neighbouring towns. 3. To assist in safeguarding the countryside from encroachment According to the Green Belt Review Stage 2, site SR-0067i makes only a weak contribution to this purpose. In comparison, two parcels adjacent to Chipping Ongar make a moderate contribution, two parcels a relatively strong contribution and all other parcels adjacent to Ongar making a strong contribution to this purpose. As such, development of the site will have least impact on this purpose of all the Chipping Ongar options. The proposed density of the site is such that it will allow high quality design and incorporate significant landscaping to minimise the impact of development on the surrounding countryside. The majority of parcels within the district were found to make a strong contribution to this purpose. In order to provide a more nuanced picture of how Green Belt performs across the District, EFDC have discounted this purpose of including land in the Green Belt in the Site Selection Methodology. 4. To preserve the setting and special character of historic towns. Existing development in the vicinity of site SR-0067i is an overwhelmingly post-war architectural experience, with the land proposed for development not forming an important factor in the setting of the town. According to the Green Belt Review Stage 2, site SR-0067i makes a moderate contribution to this purpose. Only parcel 024.2 to the far south west which is remote from services, makes a lesser contribution to this purpose. 5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The housing requirement for which land must be found would be in addition to urban capacity which will be prioritised in accordance with the NPPF. 4.6 The Green Belt Review Stage 2 makes an assessment of the potential level of harm associated with the release of each parcel in the context of purposes 1-4 and purposes 1, 2 and 4 only, i.e. excluding the effect of purpose 3 since the rural nature of the District means the majority of parcels perform strongly against this purpose. 4.7 Against purposes 1-4, harm arising from the release of parcel 013.3 was found to be high, with the majority of sites in the district having a very high potential for harm. In the context of Chipping Ongar, only three other parcels scored “high” with release of all other parcels adjacent to Chipping Ongar found to result in “very high” harm to the Green Belt. Excluding purpose 3, the parcel was still found to have high potential for harm, whereas the outcome for most other sites in the district resulted in a different result, with harm levels for many reducing. 4.8 Given the above, the development of this site would be the least harmful option for Chipping Ongar and development of this site would not conflict with the purposes of including land within

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Green Belts. 5.0 SITE SELECTION REPORT 5.1 The Site Selection Report scores the site positively in many areas, such as lack of existing uses, viability, primary school capacity, access to healthcare, open space and Central Line capacity. Below are some points of clarification, where the site was scored either neutral or negative. On-site Restrictions 5.2 Footpath 1 crosses the site, however, this is judged not to constrain development. We consider that the presence of this footpath is a benefit. This is a well-used footpath, already used as a route to the primary school by residents of Bowes Park Estate and elsewhere in the central part of Ongar. This footpath could be enhanced as part of the development, to upgrade the surface and provide a pedestrian refuge on the A414 thereby improving the linkage of the central and northern parts of the settlement and encouraging access to the footpath network. The adjacent hedgerow would be retained as a buffer between the footpath and the new development in order to maintain the rural feel of the route and provide a wildlife corridor. Marketability 5.3 The site owners are keen to sell the site or enter an agreement with a developer, however, in order to achieve best value it will not be marketed until the Local Plan is further advanced. The fact that it is not being marketed now is no reflection of the availability of the site when the time is right or willingness of the site owners to release the site for development. 5.4 The National Planning Practice Guidance (NPPG) (Paragraph: 020 Reference ID: 3-020-20140306) states that: "A site is considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners. This will often mean that the land is controlled by a developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell." The availability of this site complies with this guidance and lack of marketing at this stage should not be considered a constraint. On-site and Physical Infrastructure Constraints 5.5 Whilst part of the wider site assessed under the Site Selection Report is inside flood zones 2 and 3, the smaller site proposed for allocation is entirely within flood zone 1 and as such, flood risk will not act as a constraint to development. Primary Schools 5.6 It is stated that the site is located more than 1km from a primary school. However, this assumes access would be via car. Public footpath 1 links the site to Aukingford Gardens, from which there is pedestrian access to Shelley Primary School over a distance of only 200 metres. This is a well-used footpath, already used as a route to the school by residents of Bowes Park Estate and elsewhere in the central part of Ongar. The proposed allocation includes this footpath which could be enhanced as part of the development, to upgrade the surface and provide a pedestrian refuge on the A414 thereby improving the route to the school for existing residents as well as serving the new development. 5.7 The Site Selection Report suggests that the proposed allocations in the settlement would lead to a shortage of current primary school places in the Schools Planning Area. However, this is contrary to one of the strengths for Chipping Ongar, listed under paragraph 5.71 of the Draft Local Plan that "there is capacity within the settlement's two primary schools and the newly opened secondary academy to cater for some growth." In any event, as identified in the Site Selection Report, there is potential to accommodate growth by either expanding schools or identifying a new site; planning obligations for this site could fund expansion of existing schools or go towards a new school. Secondary Schools 5.8 The Site Selection Report similarly states that the site is located further than 1km from a secondary school. However, the newly opened Ongar Academy adjacent to the Leisure Centre is less than 800 metres away. 5.9 It also refers to a forecast deficit which is again this is contrary to one of the strengths for Chipping Ongar, listed under paragraph 5.71 of the Draft Local Plan that "there is capacity within the settlement's two primary schools and the newly opened secondary academy to cater for some growth." 5.10 In any event, as identified in the Site Selection Report, there is potential to accommodate growth through planning obligations for this site funding expansion of Ongar Academy. 5.11 Cumulative impact on the green infrastructure: This is not a constraint to delivery of this site. As stated in the Site Selection Report, development of this site provides an opportunity to enhance green infrastructure and provide a link to ecological assets within the settlement. 5.12 The site contains mature trees and a pond which could be retained as part of the masterplanning of the site. A full ecological assessment would be provided as part of a planning application. 5.13 Footpath 1 lies within the proposed allocation. It is to the west of the existing hedgerow with development being to the east. Through including both the existing hedgerow and footpath within the allocation, both of these assets could be and enhanced. 5.14 The footpath could be upgraded and a pedestrian refuge provided on the A414 thereby improving the linkage of the central and northern parts of the settlement and encouraging access to the footpath network. The hedgerow would be retained as a buffer between the footpath and the new development in order to maintain the rural feel of the route and provide a wildlife corridor. 6.0 STATEMENTS OF COMMON GROUND 6.1 We note that the intention is to meet with site promoters and seek to agree

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Statements of Common Ground. The site owners are willing to meet with the Council and enter discussions into such an agreement. 7.0 SUMMARY 7.1 In summary, the landowners of site SR-0067i (land to the west of Chipping Ongar) support part part i) of Draft Policy P4 which proposes to allocate the site for approximately 73 homes. It is a modest scheme which would lend itself to fast delivery, it is not agriculturally productive land and it is a logical amendment to Green Belt boundary. The landowner is willing to release the site for development and willing to work with the Council and enter discussions to agree a Statement of Common Ground. *SITE OWNERSHIP ATTACHED* Please see attached plan showing site ownership. Subject to the boundary amendment above, the site is within single ownership.

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