
**Representation submitted on behalf of Mr Costa in respect of
allocation of land at Park fields, Roydon, Ref. ROYD.R4**

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1. We have been instructed by Mr Costa to submit representations in respect of the allocation as set out within the proposed submission draft Local Plan in relation to land at Parklands nursery, Roydon.
2. The proposed submission allocation is referred to as ROYD.R4 and is set out at appendix 6 of the proposed submission draft plan.
3. The proposed allocation covers a site area of 0.98 hectares with an indicative development area of 0.9 hectares which at a density of 23 dwellings per hectare gives an approximate net capacity of 20 additional dwellings.
4. The site is described as containing one residential dwelling, outbuildings and agricultural land and that it is bounded by residential development to the north and east and agricultural land to the west and the south.
5. In the north western corner of the site are trees which are protected by a Tree Preservation Order as well as a public right of way along the eastern edge which clearly should be retained as part of development.
6. With this point in mind the allocation as shaded with diagonal yellow lines is a southward and westward extension of Roydon, not including the agricultural buildings but including the existing residential property: see screenshot for reference:



7. We clearly support the principle of an allocation of part of this land but object to the limited nature of the allocation and set out an alternate approach which delivers more housing without undermining any of the key principles and stated vision for Roydon, nor the essence of Green Belt policy with particular regard to paragraphs 80 and 83 of the NPPF.

8. To support the points, we enclose a proxy masterplan prepared by Form Architecture to illustrate how an envisaged scheme could be provided and contribute further to the aims of sustainable development. We appreciate that any application in due course will be the subject of scrutiny however as a guide the enclosed proxy serves a useful purpose in terms of illustrating a number of principles.

9. In respect of this proxy scheme we confirm that it provides 58 units.

10. It works around the existing property in the northwestern corner of the site and consequently any issues in respect of the protected trees. It involves the loss of

the existing agricultural buildings which are currently set outside of the Local Plan proposed submission allocation.

11. 26 affordable housing units are proposed in the northern component of the site and these are a mixture of two and three bed dwellings facing inwards towards each other together with large rear gardens set back from the existing properties to the north.
12. The road curves through the site to provide the remaining 32 private units set out differently with many larger properties but still exhibiting a range of three, four and five-bedroom properties.
13. The principle adopted in the masterplan is of built form embracing the intended access road with back gardens backing onto the site boundaries on the east, west and southern sides to give a soft boundary to the Green Belt beyond and to enable sufficient space for a significant and defensible long-term boundary, noting that this would be an augmentation of that existing and established.
14. In terms of the reasons for the revised allocation we make many points within the context of sustainable development.
15. The local planning authority is clearly of the view that some of the site can be released from Green Belt land and there is a recognition at 2.68 of the proposed submission Local Plan that land is a finite source and that the district is subject to a series of policy and environmental constraints. The housing figures conferred upon the local planning authority have evolved over a prolonged period and the overall constraints of the district are well-known to the local planning authority so there is very little merit in repeating them here. Roydon as a pre-existing settlement is a sustainable location with an established residential community.
16. It supports a mainline train station as well as a variety of shops and services which work to provide a sustainable context for the existing residential properties and, in turn, is sustained by them.

17. With regard to Green Belt as a strategic policy Roydon lies broadly between Harlow on its eastern side and Hoddesdon on its western side. In terms of the vision for Roydon it is noted in the box after paragraph 5.123 as follows:

Roydon will continue to serve the convenience needs of the local community. It will maintain its rural and local character, with sensitive design aimed at preserving the historic character of the Village. Site allocations will focus on maintaining the existing settlement pattern and ensure the continued preservation of important Green Belt, preventing coalescence between Roydon and Harlow Town.

The village will build upon its key strengths, such as the mainline railway station, as well as other assets such as the historic church, Marina Village and surrounding Lee Valley Regional Park. Links to the Lee Valley Regional Park will be improved, with impacts of recreational pressure minimised. The glasshouse industry will be supported and will continue to thrive by adapting to future challenges.

18. Roydon Hamlet lies to the south but this is some distance away and is clearly a significantly smaller settlement.
19. The local planning authority has drawn a modest site allocation which ties in with the extent of existing built form on the western side. The local planning authority's approach would involve the creation of a defensible boundary as one does not currently exist in the location that it would be required, and the proposed submission draft text anticipates this.
20. The proxy masterplan scheme submitted on behalf of the objectors avoids the existing residential property as it is seen as sustainable to keep this property which in no way prejudices the overall site masterplan.
21. The allocation as proposed presents many advantages in the interests of sustainability.
22. At this point we have regard to the general principles as set out at paragraphs 82 and 83 of the NPPF in respect of the protection of Green Belt land. At paragraph 82 it is recognised that the general extent of Green Belts is already established across the country and we confirm that we are not seeking to alter this general extent and the buffering of Roydon with Harlow and Hoddesdon.

23. Paragraph 83 confirms that local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework from Green Belt and settlement policies. Once established Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. The guidance goes on to confirm that local planning authorities should have regard to their intended permanence in the long term so that they are capable of enduring beyond the plan period.
24. The proxy masterplan and the basis of our objection to the proposed submission Local Plan has many advantages.
25. The first is that the 58 units will make a much greater contribution towards housing figures than the 20 units currently envisaged. The need for housing in the South East is a key political and social issue and Epping is an authority comprised of up to 92% of land being within the Green Belt. It is therefore always facing such challenges and consequently needs to supply housing to endure for the long term.
26. If it fails to do this then it raises its head in the short-term: it is noted that the last substantive review of the Green Belt boundary was pursuant to the 2007 Local Plan which is now over 11 years old.
27. In terms of how the allocation will affect the shape of Roydon it is noteworthy to confirm that it is not extending Roydon to the west.
28. The proposed allocation, as illustrated by the proxy plan, would still be in line with the extent of existing built form and there is a large field parcel on the western side which clearly presents with a very different set of circumstances and characteristics.
29. In addition to this the southern limit of Roydon is not being extended by the revised allocation.
30. The additional built form therefore lies within the existing limits of the settlement in respect of these parameters.

31. It therefore represents the opportunity to provide additional housing, utilising an existing defensible boundary and not seeking to extend Roydon in a matter which would result in coalescence or place undue pressure for settlements merging into one another.
32. It will not affect the overall character and "feel" of Roydon; will not undermine the attractive character of the historic core, and will be a mixed tenure estate designed to up to date master planning principles an adjunct to established development.
33. A larger quantum of development enables more of a character and community to come forward via the mater planning process.
34. We also confirm that the site is deliverable in the short term with no development constraints.
35. For these reasons we present a better opportunity for the provision of housing within a sustainable location within the context clearly of the acceptance that the site is capable of some form of release.
36. The difference between the objectors and the local planning authority is merely that of quantum. The masterplan is a proxy document to illustrate many points and clearly any application would be the subject of further work and submission.