

Proposed Site Allocations Review

Environmental, Green Belt, Landscape and Ecology

**ONGAR PARK ESTATE,
NORTH WEALD BASSETT**

Peer Group plc

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1 INTRODUCTION

1.1.1 Liz Lake Associates (LLA) has been appointed by Peer Group plc to prepare a review of the proposed site allocations (for residential development) within the Submission Version (2017) of the Epping Forest District Council (EFDC) Local Plan.

1.1.2 At the Draft local plan consultation (October-December 2016), LLA was appointed by Peer Group plc to promote part of the land at Ongar Park Estate, North Weald Bassett (the Site) for residential allocation. The practice prepared the following reports, which were submitted to EFDC, as follows:

- Environmental Issues report,
- Landscape Sensitivity and Capacity Study
- Green Belt Review: Site and Boundaries Study
- Ecological Review.

1.1.3 These reports have been reviewed for the purposes of this Regulation 19 (January 2018) Consultation. These reports have also been used to inform the information used in this report.

1.1.4 This report appraises the Environmental Issues (including Green Belt, landscape, visual, ecological aspects) associated with EFDC's proposed site allocations in North Weald Bassett, as contained at Policy P6 (page 143) in the EFDC submission Local Plan.

1.1.5 The review then contrasts and compares the key environmental issues associated with the proposed allocations and those issues relevant to the site currently being promoted by Peer Group which, by contrast, has not been allocated at this point.

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BACKGROUND

2.1 The EFDC Site Allocations – Submission Version 2017

2.1.1 The EFDC Submission Version 2017 has allocated five residential sites:

- NWB.R1 Land at Bluemans – Approximately 223 homes
- NWB.R2 Land at Tylers Farm – Approximately 21 homes
- NWB.R3 Land south of Vicarage Lane – Approximately 728 homes
- NWB.R4 Land at Chase Farm – Approximately 27 homes
- NWB.R5 Land at The Acorns, Chase Farm – Approximately 51 homes

2.1.2 At para.5.86 of the Submission Version 2017 it states,

“The Council has produced a number of studies to consider the future of North Weald Airfield. In 2014 the findings from these studies were integrated into a wider masterplan for the village which presents a long term vision and aspirations for the village. The proposals presented within the North Weald Bassett Masterplanning Study (‘the Study’) were subject to public consultation and reported to Cabinet in October 2014. The content of the North Weald Bassett masterplan has informed the proposals contained within this sub-section. For the purpose of this Plan when reference is made to ‘North Weald Bassett’ it refers to the settlement of North Weald Bassett, recognising that the Parish encompasses North Weald Bassett Village, Thornwood and Hastingwood.”

2.1.3 As part of the ‘Vision for North Weald Bassett’ (p.142) the Submission Version of the EFDC Local Plan also states that,

“...Future development will be located to the northern side of the village, in line with the vision set out in the 2014 masterplan...”

2.1.4 It is therefore clear that the Local Plan allocations for North Weald Bassett have been most heavily influenced by the “North Weald Bassett Masterplanning Study” (the Study) which was commissioned by EFDC and prepared by Allies and Morrison in September 2014.

- 2.1.5 The proposed residential allocations (NWB R1 - R5) do not have any foundation based on the Allies and Morrison Masterplanning Study. For example, one of the key spatial aims set out in the Executive Summary of the Masterplanning Study highlights the linear shape of the settlement being part of its inherent character. The proposed site allocations in the submission Local Plan are contrary to this spatial character. This is later discussed in section 3 of this report.
- 2.1.6 The Allies and Morrison Masterplanning Study 2014 was written well ahead of Arup Site Suitability Assessment Report (SSA) in 2016, which included an assessment of 4 out of the 5 residential allocations now included in the Submission Version of the Local Plan.
- 2.1.7 It should be noted that one of the allocated sites NWB.R5 was not included as part of the Arup SSA (2016) and therefore it is unclear whether the relevant issues associated with that site were properly assessed or considered prior to its allocation.
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3 EFDC LOCAL PLAN EVIDENCE BASE – ISSUES AND CONFLICTS

This section outlines several issues and conflicts that have been identified in relation to the allocation of the residential sites in the Local Plan Submission Version 2017 and the guidance provided by some of the studies within the EFDC Evidence Base.

3.1 North Weald Bassett Masterplanning Study – 2014

3.1.1 The LLA Environmental Issues report (updated January 2018 and submitted as part of these regulation 19 representations) outlines several concerns relating to the soundness of the Masterplanning Study. The summary of findings within the study (p.143) includes, *“Feedback from the options exhibition suggests that Scenario B (with no growth to the south of the settlement) is the preferred approach for any new development in the area...”*

3.1.2 As previously outlined in the Liz Lake Associates Environmental Issues report, *“2.2.3 ... There does not appear to be any rationale for this approach, which removed an “Option A” site coloured red and “Option B” site coloured orange, to be replaced by additional third tier sites coloured yellow, to the northwest of the village, on high quality agricultural land.*

2.2.4 Out of 160 people attending the “community exhibition” on 28 June only 44 responses we received by EFDC (35 feedback forms and 9 written responses). Those responses have not been made available on the Council’s evidence base but, from the analysis contained in the A&M masterplanning study (page 141), it appears that the public supported development which included new housing to the southeast of the village, on the basis that this would provide “Better distribution of housing”.

2.2.5 EFDC appears to have either ignored or misinterpreted the public feedback from the 35 feedback forms and 9 written representations (which only reflects a tiny proportion of the community) in favour of locating all new dwellings to the northwest of the village, on land which was in the third tier (coloured yellow) of the A&M assessment. This will seriously undermine the settlement pattern and will not provide the best distribution of new dwellings. It will also sterilise high quality

agricultural land where lower quality non-agricultural land is available, to the southeast of the village....”

- 3.1.3 In relation to the spatial framework for the masterplanning study it states that,
- “...North Weald Bassett has a relatively coherent pattern of settlement based on incremental development to either side of the High Road. The linear shape of the settlement set within Metropolitan Green Belt ensures that all residents live within a few minutes’ walk to open countryside. New development should respect, protect and augment the inherent character of the North Weald Bassett to preserve and enhance the benefits it brings to its residents.”¹*
- 3.1.4 We agree with this statement and believe the land at Ongar Park Estate being promoted by Peer Group does, as a matter of fact, meet this key aim. The Site retains the rectilinear form of the settlement by abutting the settlement edge and following the line of the existing settlement boundary, providing a balance to the existing settlement pattern on both sides of the High Road.
- 3.1.5 Scenario A within the Masterplanning Study abided by the key spatial aim of respecting the linear character of the village (as its Option 1 and 2 included development areas that were located on both sides of the settlement) to a much higher degree than Scenario B. The Land at Ongar Park Estate was included within Scenario A, Option 1 and Option 2 -(p.120-121) of the Masterplanning Study. In contrast, only the area now proposed for allocation as NWB.R1 was included as part of Option 1 in Scenario A. Only part of the area now proposed for allocation as NWB.R3 was included as part of Option 2 and the remainder of the areas now proposed for allocation as NWB.R3, NWB.R4 and NWB.R5 were only included as part of Option 3. The proposed allocation NWB.R2 did not feature in any Option outlined in Scenario A or B.

¹ North Weald Masterplanning Study, Allies and Morrison, September 2014. P6.

- 3.1.6 There is no explanation for why Option B was considered by Allies and Morrison and no rational outcome to support that option.
- 3.1.7 The A&M approach to development to the southeast of the village (Scenario A Options 1 and 2) has been fully embraced by Peer Group, which provides strong links and connections to the rest of the settlement, in turn preserving and enhancing benefits for the residents and creating potential for access to new open space.
- 3.1.8 The cumulative effect of developing all of the proposed allocated sites in Scenario B (which excludes sites to the south of the village) would completely alter the linear character of the settlement and therefore not fulfil the key spatial aim of the Masterplanning Study, upon which the Submission Version 2017 has stated its ‘Vision for North Weald Bassett’.
- 3.1.9 Given that the conclusion of the Masterplanning Study appears to be flawed for the reason outlined above as well as in the previous LLA Environmental Issues report, we believe that the inclusion of the Land at Ongar Park Estate for allocation within the new EFDC local plan should be reviewed.
- 3.1.10 As previously stated, the Site currently being promoted by Peer Group plc is located on an area of non-agricultural land and is also abutting the settlement edge in a long rectilinear shape that would maintain and enhance the linear form of North Weald Bassett.

3.2 Arup Site Suitability Report (2016)

- 3.2.1 The LLA Environmental Issues Report identified several issues with the 2016 report. Namely the inconsistencies and factual errors relating to site references SR-0269A and SR-0310. These two large parcels of land to the southeast of North Weald Bassett contrast greatly in size with the significantly smaller parcels of land being promoted by Peer Group.
- 3.2.2 As outlined in the LLA Environmental Issues Report,
“2.3.2 It is not clear why the Council instructed Arup to consider and assess of the Ongar Park Estate for housing development (6,027 dwellings) when A&M had

identified, in 2014 (and Peer Group had agreed), to only advance 15.26ha (38 acres) for approximately 280 dwellings. As such, the Arup site assessment was fundamentally flawed from the outset.”

3.2.3 As noted in the LLA Environmental Issues Report,

“2.3.14...the assessment parcels being discussed by Arup in this context are larger than the land being promoted by Peer Group. This has led the Council to misdirect itself.”

3.2.4 By way of comparison, Table 1 (Appendix A) in this report provides a comparison of scores given to the relevant previous EFDC SSA parcels that correlate to the Submission Version 2017 allocations with the scores (as appraised in LLA Environmental Issues Report) relating to various landscape, visual and environmental issues.

3.2.5 Table 1 demonstrates that the Site being promoted by Peer Group (if it had been properly assessed as part of the EFDC SSA (2016)) scored similarly and in some cases more favourably in relation to landscape, visual and environmental issues than some of the sites that have proceeded to allocation.

3.2.6 The decision to remove the Land at Ongar Park Estate from the allocation process as part of the EFDC SSA has been misguided due to the large size of the sites assessed and disregard for assessing the Land at Ongar Park Estate on its own. The correct assessment would have concluded that the promoted site abuts the settlement edge, has been identified as falling within an area of low landscape sensitivity and development would have the potential to improve settlement character through the redevelopment of a run down site. The Site is located on non-agricultural land whereas development of the other allocated sites would involve the loss of best and most versatile agricultural land. The Site is not located within or adjacent to ancient woodland, has no topography constraints and the BAP features and species in the Site can be mitigated.

- 3.2.7 It is noted that site allocation NWB.R5 was not considered as a site or part of a site within the EFDC SSA 2016. It appears as part of site SR-0455 as shown on p.73 of the North Weald Masterplanning Study 2014 but it is not included as part of SR-0455 within the EFDC SSA 2016. Justification for this is not explained within the document. It demonstrates further that EFDC appear to have relied more heavily on the North Weald Masterplanning Study for its site allocations, in preference to any other assessment in the Council's evidence base.
- 3.2.8 At the time of writing this report, the Methodology for the Arup Site Selection Report (December 2017) was available on the EFDC website as part of the technical information, but the appendices (including the assessment of residential and employment sites) were not available. The reasons to explain why the Ongar Park Estate has not been allocated in the submission Local Plan are not therefore available to consider as part of this response to Regulation 19 consultation.

3.3 Green Belt Issues

- 3.3.1 The LLA Green Belt Review looked at the Green Belt Issues associated with the potential development of the Site. Its conclusions still remain valid and should be read in conjunction with this report.
- 3.3.2 It identified that the EFDC Stage 2 Green Belt Assessment assessed two parcels of land (011.1 and 011.2) that were much larger than the Site being promoted by Peer Group. The LLA review therefore split the Site into two parcels based on a review of its features and boundaries (1C and 2D).
- 3.3.3 It also provided a comparison of the assessment results from the EFDC Stage 2 Green Belt Assessment for the parcels relevant to the Site (011.1 and 011.2) as well as the parcels located to the west of the village by the airfield (namely 010.1, 010.2, 008.1 and 008.2). The allocated sites in the Submission Version 2017 fall broadly into 010.1 and 010.2.
- 3.3.4 The LLA Green Belt Review provided evidence to demonstrate that parcels 1C and 2D (the Site) are better options for release from the Green Belt than the parcels to the

west of the village, particularly those on high quality agricultural land, of which all of the allocated sites are.

3.3.5

The Appendices to the Council's Site Selection Report in respect of residential sites are all missing from the Regulation 19 evidence base. It is not therefore possible to ascertain why the Council has allocated high value Green Belt sites in preference to lower value Green Belt sites. It is however clear that the Council is failing to apply the sequential approach in Policy SP 2 - A (vi) to its site allocations.

4 ALLOCATIONS REVIEW

This section considers each residential site allocation in turn in relation to specific Landscape, Visual or Environmental Issues. The Ecological Issues relating to each allocation are reviewed as part of this section were undertaken by Ecologist and Landscape Manager, Susan Deakin. For ease of reference, a comparison table (Table 2) of the key Landscape, Visual, Environmental, Green Belt, Ecology for each allocated site and the Land at Ongar Park Estate is included in Appendix D of this report.

4.1 NWB.R1 – Land at Bluemans

4.1.1 NWB.R1 lies adjacent to the south of the A414 and the curtilages of the Queen’s Hall Community Centre and St Andrews Primary School. It forms a broadly L-shaped parcel of land with boundaries formed of hedgerows and hedgerow trees and is currently in use as an agricultural field. It forms the southern section of site reference SR-0036 (EFDC SSA, 2016).

Landscape Issues

4.1.2 NWB.R1 lies within LCA F5: North Weald in the EFDC Landscape Character Assessment, identified as having moderate sensitivity to change. It contains some features identified as sensitive within the LCA, such as hedgerows and hedgerow trees. NWB.R1 is largely representative of this LCA.

4.1.3 NWB.R1 lies within Landscape Setting Area 2 within the EFDC Settlement Edge Landscape Sensitivity Study (SELSS). This area was identified as being of moderate sensitivity. NWB.R1 also lies directly in an area identified as ‘sensitive historic landscape: 18th-10th Century Enclosure’ on Figure 11.4 within this study. The study concluded that the overall landscape sensitivity of Landscape Setting Area 2 to be Moderate.

4.1.4 SELSS also states that,

“...those Landscape Setting Areas identified as high or moderate overall sensitivity are considered desirable to safeguard in landscape terms and are considered to have a significant role in contributing to the structure, character and setting of the settlement.”²

4.1.5 The public byway that runs along the western boundary of the allocation is noted within the SELSS as being a key pedestrian route (Figure 11.1, SELSS).

4.1.6 For the reasons and features outlined above, we consider that NWB.R1 should be considered to be moderate/high landscape sensitivity.

Visual Issues

4.1.7 Landscape Setting area 2 (SELSS) is also identified as an area that has moderate visual prominence and intervisibility³.

4.1.8 NWB.R1 lies very close to an ‘urban gateway’ identified within the SELSS. Under the ‘visual character section’ of the study, it notes that,

“There are four urban gateways, along the A414 and B181 road corridors, which mark the transition between the village and surrounding, predominantly rural landscape;”⁴

4.1.9 Development of this parcel could therefore detract and alter the visual character of the transition of the village to its rural surroundings.

² P.94 SELSS, CBA.

³ P.94 SELSS, CBA.

⁴ P.90 SELSS, CBA.

Soils

- 4.1.10 NWB.R1 has been identified as lying on land that is of Grade 2 Agricultural Quality (Very Good)⁵.

Ecology

- 4.1.11 The site is generally bounded and sub-divided by mature hedgerows (likely to be ‘important’) and containing a number of substantial mature trees (mainly oak, with some ash). The hedgerows provide wildlife corridors, with potential for breeding birds, herptile inhabitation and bat foraging routes and contain a number of mature trees that have the potential for bat roosts.

- 4.1.12 NWB.R1 does not offer additional land on which to provide habitat enhancement,

Green Belt

- 4.1.13 Lies within O10.1 within EFDC Stage 2 Green Belt Assessment. Identified as having a ‘Low’ level of harm on Green Belt purposes.

Summary of NWB.R1

- 4.1.14 Development of NWB.R1 would extend the settlement edge further west along the A414. It would also have a permanent, adverse effect on the contribution the site currently makes to the transition between the settlement and the predominantly rural surroundings because it is located nearby to one of the ‘urban gateways’ of North Weald Bassett. It would cause the loss of Grade 2 Agricultural Land. These issues could not be easily mitigated.

⁵ Agricultural Land Classification map, Natural England
<http://publications.naturalengland.org.uk/category/5954148537204736>

4.1.15 NWB.R1 does not offer any additional land on which to provide habitat enhancement that would offset any ecological losses resulting from development.

4.2 NWB.R2 – Land at Tylers Farm

4.2.1 NWB.R2 lies adjacent to the A414 and B181, the roundabout junction of which lies immediately adjacent to the site's eastern corner. It currently comprises several farm buildings and a residential dwelling set within a large plot bounded by mature hedgerow and trees and an area of scrub land in its western sector.

Landscape Issues

4.2.2 NWB.R2 lies within an area identified as urban within the EFDC Landscape Character Assessment.

4.2.3 Part of NWB.R2 lies within Landscape Setting Area 2 within the EFDC Settlement Edge Landscape Sensitivity Study (SELSS). This area was identified as being of moderate sensitivity. Part of NWB.R2 also lies within an area identified as a 'Major Woodland Block' on Figure 11.1 in SELSS. The study concluded that the overall landscape sensitivity of Landscape Setting Area 2 to be Moderate.

4.2.4 There are no public rights of way that run within NWB.R2 but there is a pedestrian route that runs adjacent to its eastern boundary along the road.

4.2.5 Development of NWB.R2 is likely to involve significant tree loss that would be difficult to replace or mitigate as well as accommodating the 21 homes identified in the allocation.

Visual Issues

4.2.6 NWB.R2 lies directly adjacent to one of the 'urban gateways' identified in the SELSS as being key markers of the transition from the settlement to its predominantly rural surroundings.

4.2.7 It is expected that development of NWB.R2 would involve significant tree loss which would decrease the amount of existing enclosure around this particular site. The

enclosure and soft green boundaries of the site are key at this ‘urban gateway’ to retaining the transition between settlement and the rural area to the west of the settlement.

Soils

- 4.2.8 NWB.R2 has been identified as lying on land that is of Grade 2 Agricultural Quality (Very Good)⁶.

Ecology

- 4.2.9 The western sector of the site (beyond the garden) is well developed scrub and may be inhabited by protected species including reptiles, badgers, dormice, bats, breeding birds. There may also be bat / barn owl roosts within the house and associated buildings. There is a well developed hedgerow with a number of mature trees with bat potential along the boundary with NWB.R1. Any development is likely to necessitate significant tree loss.
- 4.2.10 NWB.R2 does not offer additional land on which to provide habitat enhancement that would offset any ecological losses resulting from development, unlike the Land at Ongar Park Estate.

Green Belt

- 4.2.11 Lies within O10.1 within EFDC Stage 2 Green Belt Assessment. Identified as having a ‘Low’ level of harm on Green Belt purposes.

Summary of NWB.R2

- 4.2.12 Development of NWB.R2 is likely to involve significant intensification of the existing land use and would likely cause significant tree loss. It would cause the loss of a section of Grade 2 agricultural land. Without very careful design, the enclosed nature of this site and its soft green edges which are key to maintaining the urban-rural

⁶ Agricultural Land Classification map, Natural England
<http://publications.naturalengland.org.uk/category/5954148537204736>

transition at the ‘urban gateway’ of North Weald Bassett, are likely to be lost as a result of the development of NWB.R2.

- 4.2.13 NWB.R2 does not offer any additional land on which to provide habitat enhancement that would offset any ecological losses resulting from development.

4.3 NWB.R3 – Land south of Vicarage Lane

- 4.3.1 NWB.R3 forms the largest area of land of any of the residential allocations. It lies south of Vicarage Lane West with part of its southern and eastern boundaries abutting the northern edge of North Weald Bassett. It currently comprises several agricultural fields with mature hedgerow boundaries.

Landscape Issues

- 4.3.2 NWB.R3 lies within LCA F5: North Weald in the EFDC Landscape Character Assessment, identified as having moderate sensitivity to change. It contains some features identified as sensitive within the LCA, such as hedgerows and hedgerow trees. NWB.R3 is largely representative of this LCA.
- 4.3.3 NWB.R3 lies within Landscape Setting Area 2 within the EFDC Settlement Edge Landscape Sensitivity Study (SELSS). This area was identified as being of moderate sensitivity. The study concluded that the overall landscape sensitivity of Landscape Setting Area 2 to be Moderate.
- 4.3.4 SELSS also states that,
- “...those Landscape Setting Areas identified as high or moderate overall sensitivity are considered desirable to safeguard in landscape terms and are considered to have a significant role in contributing to the structure, character and setting of the settlement.”⁷*

⁷ P.94 SELSS, CBA.

- 4.3.5 SELSS identified that there are several sensitive recreational routes that pass through the area now allocated as NWB.R3. A floodplain, with wider ecological value, also lies along its western boundary along with an area of woodland identified as a ‘major woodland block’ (Refer Figures 11.1 and 11.4 in SELSS).
- 4.3.6 Parts of the fields in the north western and north eastern sectors of NWB.R3 are noted as ‘historic fields with boundary lost’ on Figure 11.2 in SELSS. Development of NWB.R3 would therefore cause permanent loss of these agricultural fields within little opportunity for reinstatement other than the possibility of reinstating the boundaries within the new development but the historic agricultural land use would be lost entirely.
- 4.3.7 The fields that form NWB.R3 form an important part of the predominantly rural character that surrounds North Weald Bassett. Development of it would completely alter the ‘linear’ character of North Weald Bassett as noted in the key characteristics of the EFDC LCA.

Visual Issues

- 4.3.8 Landscape Setting area 2 (SELSS) is also identified as an area that has moderate visual prominence and intervisibility⁸.
- 4.3.9 Users of the PRoW that pass through NWB.R3 would see a direct, permanent adverse effect in the views currently afforded to them due to the change in land use from agricultural land to residential development.

Soils

- 4.3.10 NWB.R3 has been identified as lying on land that is of Grade 2 Agricultural Quality (Very Good)⁹.

⁸ P.94 SELSS, CBA.

⁹ Agricultural Land Classification map, Natural England

<http://publications.naturalengland.org.uk/category/5954148537204736>

Ecology

- 4.3.11 There are good peripheral and sub-dividing hedges (likely to be ‘Important’) and frequent mature hedgerow oaks some of which are likely to be veteran trees. The hedgerow network and stream corridor may also be used by herptiles.
- 4.3.12 NWB.R3 does not offer additional land on which to provide habitat enhancement that would offset any ecological losses resulting from development, unlike the Land at Ongar Park Estate.

Green Belt

- 4.3.13 Lies within O10.2 within EFDC Stage 2 Green Belt Assessment. Identified as having a ‘Moderate’ level of harm on Green Belt purposes.

Summary NWB.R3

- 4.3.14 Development of NWB.R3 would extend the settlement edge much further north and west than it is currently and due to its large size it would completely alter the ‘linear’ character of the settlement, noted as one of the key characteristics of LCA F5 and one of the key spatial aims within the North Weald Bassett Masterplanning Study. It would also cause the loss of Grade 2 Agricultural Quality. These issues could not be easily mitigated.
- 4.3.15 NWB.R3 does not offer any additional land on which to provide habitat enhancement that would offset any ecological losses resulting from development.

4.4 NWB.R4 – Land at Chase Farm

- 4.4.1 NWB.R4 is forms an irregular parcel of land that includes a triangular piece of land at Chase Farm and the existing single lane access road. It is currently in use for B1, B2 and B8 use classes with several assorted farm and warehouse units of various sizes. There are some short lengths of mixed species hedging on the north eastern and north western boundaries of the triangular section of the parcel.

Landscape Issues

- 4.4.2 NWB.R4 lies within LCA F5: North Weald in the EFDC Landscape Character Assessment, identified as having moderate sensitivity to change. It contains few of the key characteristics or features of this area. It is not representative of the surrounding LCA.
- 4.4.3 NWB.R4 lies within Landscape Setting Area 2 within the EFDC Settlement Edge Landscape Sensitivity Study (SELSS). This area was identified as being of moderate sensitivity. The study concluded that the overall landscape sensitivity of Landscape Setting Area 2 to be Moderate. The SELSS notes that there is a key recreational route that runs along the access road that is part of NWB.R4 (Refer Figure 11.4 in SELSS).
- 4.4.4 At a site scale this site is not particularly representative of this landscape setting area. However development of the parcel from isolated B1, B2 and B8 use into residential use has the potential to detract from the settlement character as it could introduce suburban features into a currently rural landscape setting. Therefore, we consider careful design decisions are necessary in the redevelopment of this parcel for residential development because its surrounding agricultural, rural setting means that suburban-style housing may not be particularly congruent with the surrounding landscape area.

Visual Issues

- 4.4.5 Landscape Setting area 2 (SELSS) is identified as an area that has moderate visual prominence and intervisibility¹⁰.

¹⁰ P.94 SELSS, CBA.

Soils

- 4.4.6 NWB.R4 lies within an area identified as Grade 2 Agricultural Quality but is not currently in agricultural use.

Ecology

- 4.4.7 Low potential for roosting bats within storage / warehouse units. There is a hedge peripheral to the site, which would need to be retained and enhanced in any scheme.
- 4.4.8 NWB.R4 does not offer additional land on which to provide habitat enhancement that would offset any ecological losses resulting from development, unlike the Land at Ongar Park Estate.

Green Belt

- 4.4.9 Lies within O10.2 within EFDC Stage 2 Green Belt Assessment. It was identified in that report as having a 'Moderate' level of harm on Green Belt purposes. However, NWB.R4 forms a much smaller parcel within this and does not abut the existing settlement edge of North Weald Bassett. Purpose 5 was also not assessed in the EFDC Stage 2 Assessment. The redevelopment of this land would constitute regeneration of previously developed land.

Summary of NWB.R4

- 4.4.10 NWB.R4 does not abut the existing settlement edge of North Weald Bassett. Development of NWB.R4 for residential purposes has the potential to introduce suburban features into an area that is currently predominantly rural in character. Careful consideration for mitigating any adverse effects on the landscape character would be required to avoid adverse landscape and visual effects on the surrounding area and receptors.
- 4.4.11 NWB.R4 does not offer any additional land on which to provide habitat enhancement that would offset any ecological losses resulting from development.

4.5 **NWB.R5 – Land at The Acorns, Chase Farm**

4.5.1 NWB.R5 is located south of Vicarage Lane West. It forms a broadly L-shaped parcel of land. There are several uses on the land including residential and B1, B2 and B8 uses. The site comprises an occupied house and managed gardens in the north eastern part, with the remainder containing disused glass houses, storage yards and areas of rough grass, tall ruderal vegetation and some outbuildings, with peripheral hedgerows. There is also a veteran oak tree that lies adjacent to Vicarage Lane in the north eastern part of the site.

Landscape Issues

4.5.2 NWB.R5 lies within LCA F5: North Weald in the EFDC Landscape Character Assessment, identified as having moderate sensitivity to change. It contains some of the key characteristics or features of this area, namely hedgerows and a horticultural nursery. It is therefore partially representative.

4.5.3 NWB.R5 lies within Landscape Setting Area 2 within the EFDC Settlement Edge Landscape Sensitivity Study (SELSS). This area was identified as being of moderate sensitivity. The study concluded that the overall landscape sensitivity of Landscape Setting Area 2 to be Moderate. The SELSS notes that there is a key recreational route that runs along the access road adjacent to NWB.R5 (Refer Figure 11.4 in SELSS). Figure 11.4 also notes the presence of a veteran tree in the north eastern part of the site. Any development would need to allow for retention of the oak and peripheral hedgerow network and trees.

4.5.4 Redevelopment of the parcel from B1, B2 and B8 uses and residential use into purely residential use for approximately 51 dwellings would have the potential to introduce suburban features into a currently rural landscape setting. For example, a higher density of residential development and street lighting. We consider that careful design decisions would be required for the redevelopment of this parcel in order to mitigate adverse landscape effects.

Visual Issues

- 4.5.5 Landscape Setting area 2 (SELSS) is identified as an area that has moderate visual prominence and intervisibility¹¹.

Soils

- 4.5.6 NWB.R5 has been identified as lying on land that is of Grade 2 Agricultural Quality (Very Good)¹². The areas of the site that are currently undeveloped have the potential to be used for agricultural purposes. Therefore, redevelopment of the site into residential use would cause the loss of Grade 2 Agricultural land.

Ecology

- 4.5.7 A veteran oak tree lies adjacent to Vicarage Lane, in the far NE part of the site (adjacent to the access track with NWB. N4). The site comprises an occupied house and managed gardens in the NE part, with the remainder containing disused glasshouses, storage yards and areas of rough grass, tall ruderal vegetation and some outbuildings, peripheral hedgerows. These areas may support herptiles, ground nesting birds and other wildlife.
- 4.5.8 NWB.R5 does not offer additional land on which to provide habitat enhancement that would offset any ecological losses resulting from development, unlike the Land at Ongar Park Estate.

Green Belt

- 4.5.9 Lies within 010.2 within EFDC Stage 2 Green Belt Assessment. It was identified in that report as having a 'Moderate' level of harm on Green Belt purposes. However, NWB.R5 forms a much smaller parcel within this and does not abut the existing settlement edge of North Weald Bassett. Purpose 5 was also not assessed in the

¹¹ P.94 SELSS, CBA.

¹² Agricultural Land Classification map, Natural England

<http://publications.naturalengland.org.uk/category/5954148537204736>

EFDC Stage 2 Assessment. The redevelopment of this land would constitute regeneration of previously developed land.

Summary of NWB.R5

4.5.10 NWB.R5 does not abut the existing settlement edge of North Weald Bassett. Development of NWB.R5 for residential purposes has the potential to introduce suburban features into an area that is currently predominantly rural in character. It would cause the loss of some Grade 2 agricultural land.

4.5.11 NWB.R5 does not offer any additional land on which to provide habitat enhancement that would offset any ecological losses resulting from development.

4.6 Land at Ongar Park Estate

4.6.1 The other LLA reports cover the issues associated with the Land at Ongar Park Estate in extensive detail.

4.6.2 Table 2, Appendix D, provides a clear comparison of the issues associated with each allocated site and the Land at Ongar Park Estate.

4.6.3 In summary,

- The north portion of the site is of low landscape sensitivity and the southern portion of medium landscape sensitivity. This is lower than any of the proposed residential allocations in the submission Local Plan.
- It is of moderate low visual prominence, this is also lower than any of the proposed residential allocations.
- The site's soils are classified as non-agricultural use.
- The resultant harm on the Green Belt if the site were released is comparable or lower than the proposed allocated sites.
- Unlike the other proposed allocations, the Land at Ongar Park Estate can offer a significant amount of additional land to the south west of the

development which would be the subject of a comprehensive and sympathetic conservation management, to off-set any biodiversity losses associated with a proposed scheme and provide substantial long term ecological gain.

5 CONCLUSION

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- 5.1.1 The Site's that have been allocated for residential development as part of the EFDC Local Plan Submission Version 2017 appear to contradict the conclusions and guidance provided by documents within the existing evidence base. It appears that the allocated residential sites have been chosen following a series of decisions that have been more heavily influenced by the Council's interpretation of the Allies and Morrison North Weald Masterplanning Study in 2014 and not by rationale assessment or robust evidence. The conclusions of the A&M Masterplanning Study do not support the strategy adopted by the Council and have been questioned in detail in the LLA Environmental Issues report. Development of the Land at Ongar Park Estate along with some of the proposed allocations, as outlined originally in Scenario A of the Masterplanning Study, would align more closely with the key spatial aims and objectives of the Masterplanning Study.
- 5.1.2 LLA Table 1 (Appendix A) shows that the Ongar Park Estate is a more preferable site than the proposed residential allocations in environmental terms.
- 5.1.3 Upon review of the environmental issues pertaining to each allocated site it is clear that there are similar landscape, visual and environmental issues relating to the potential development of the residential allocations than of the Site being promoted by Peer Group plc. There appears to be no clear reason why those sites that have been allocated should be assessed or treated more favourably than the Ongar Park Estate.
- 5.1.4 The ecological issues pertaining to each allocated site and the Land at Ongar Park Estate have been reviewed. Several of the allocated sites have mature hedgerows that are likely to be 'important' and have several veteran trees within their boundaries. Any scheme would have to allow for the retention of these with appropriate mitigation for impacts on protected species.
- 5.1.5 Development of the would need to allow for retention of the ponds, the woodland and mature trees and potentially some areas of rough grassland / developing scrub

habitat, along with appropriate mitigation and compensation for impacts on protected species. This site has the benefit of association with a significant area of developing habitat to the south-west (as shown on Figure 11 Landscape and Biodiversity Opportunities Plan, Appendix A of LLA Ecological Review). It is proposed that this extensive area associated with and complementary to Ongar Radio Station LoWS and the Weald Common LoWS and LNR is the subject of comprehensive and sympathetic conservation management, to off-set any biodiversity losses associated with the proposed scheme and to provide substantial long term ecological gain.

- 5.1.6 None of the other allocated sites have yet offered this opportunity to improve open space, ecological habitats and improvements to the landscape character of the setting of the settlement.
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