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Epping Forest District Draft Local Plan 2018 Submission Version Response on Behalf of Bloor Homes Eastern to Land at London Road, Chipping Ongar Site: SR-0051

Introduction

These representations to the Submission Draft Local Plan are submitted on behalf of Bloor Homes Eastern, who have an interest in land immediately adjoining the settlement boundary at London Road, Chipping Ongar.

The site is shown on the location plan attached with this response with the site edged in red. Our clients also have interests in land to the north of the A414 London Road as identified in blue on the location plan, but this has been excluded on the basis that the land south of London Road is better-related to Chipping Ongar. The land edged in red equates to an area of 12.54ha as noted within the Arup report¹ which addressed site selection and methodology, and although they indicate that this could accommodate 375 dwellings at a density of 30dph gross, we consider that the capacity will be somewhat less than this, at around 250 dwellings, in order to allow for landscaping and open space to facilitate a softer urban edge in this part of Chipping Ongar, compared to the rather harsh boundary that exists at present.

These representations will, in addition to outlining our proposal for the residential allocation of SR-0051, respond to matters raised both within the Submission Draft Local Plan itself, and in particular to the evidence base.

These responses relate directly to the questions Q6 and Q7 on the representation form and hence are labelled as such.

Policy SP2 Spatial Development Strategy 2011-2033

Q6: This policy sets out a strategy which does not rely on the scale or sustainability of settlement types, but instead a reliance on a sequence of locations dictated by flood risk, open spaces, brownfield land, Green Belt etc. and is thus a constraint led approach. There have been a number of changes in the distribution and location of allocated sites since the Reg 18 consultation, but it is not clear from the evidence base how the changes have been justified, given that the sequential approach factors are relatively fixed and have not changed between consultations.

¹ *Strategic Land Availability Assessment (Nathaniel Lichfield & Partners 2016) EB800 Site Selection Report (Arup 2016) EB801*



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In particular, when Phase 2 Planning sought clarification from officers during the current consultation, they pointed to a 'frequently asked question' on their consultation website which states:

"I cannot find details in the evidence base as to why individual sites have been discounted by the Council. When will the remaining appendices to the Site Selection Report be made available?"

The Site Selection Report has been published by the Council as part of the Regulation 19 Publication of the Local Plan Submission Version. However, the Council is yet to publish all of the detailed appendices which accompany the Site Selection Report and provide details relating to the assessment of individual sites. This does not mean that this assessment work has not been completed, but rather the delay in the publication of the appendices is due to the time it takes to generate the pro forma for each site, including the mapping for each site, all of which must be checked for accuracy before publication. These appendices will be published by the Council prior to the Submission of the Local Plan for Independent Examination.

The Council considers that the suite of evidence base documents available is adequate and sufficient to enable those wishing to make representations on the Local Plan Submission Version to do so. The information currently available concerning the sites allocated in the Local Plan Submission Version is sufficient to allow any disappointed party promoting non-allocated sites to make representations as to the comparative merits of allocating the promoted site. However, for the avoidance of doubt, the Council will bring the publication of the remaining appendices to the attention of the Planning Inspector appointed to examine the Plan to ensure that the issue can be considered appropriately through the Independent Examination process."

In our view, it is impossible to make any sense of the changes to the Plan and the justification for the introduction of new sites and deletion of those previously proposed, without sight of this key part of the Council's evidence base. In our view, it is testimony to the Submission draft being rushed to avoid any increase in housing numbers as a result of the Government's consultation on standard method for calculating local authorities' housing need (*Planning for the Right Homes in the Right Places: Consultation Proposals Sept 2017*), which suggested an increased annual requirement from 514 to 923 dwellings based on the standard methodology. This was proposed to be brought in by 31st March 2018 for those authorities that were not advanced with their Local Plans.

As evidence of this, at the Special Council meeting of 14th December 2017, Members were advised by legal Counsel that due to this, the Council must not generate a need for further consultation with the Plan, and that no additions or deletion of sites could take place without such a need being generated (https://eppingforestdc.public-i.tv/core/portal/webcast_interactive/323384).



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Notwithstanding this, we have concerns over the order of the factors within the sequential approach, in particular the identification of previously developed land in the Green Belt and greenbelt/green field land on the edge of settlements below the use of urban open spaces. This has generated considerable objection within those settlements affected by the loss of valued open spaces, which are clearly more sensitive than the loss of brownfield sites within the Green Belt and sites which adjoin urban areas.

In addition to our concerns regarding to the sequential approach to development that has been applied within this policy, we also query 11,400 as the minimum number of new homes to come forward in the Plan period. The latest SHMA (West Essex and East Hertfordshire Strategic Housing Market Assessment, September 2015) suggests a figure of 12,573 and there is no justification as to why this figure has not been adopted within the Plan, particularly given that the Council have significantly underperformed in terms of meeting their previous housing requirements. The Government's consultation on the supply of housing in 2017 (Planning for the Right Homes in the Right Places), indicates the clear direction of travel for National Policy, identifying a draft figure of 20,000 dwellings for the District within the Plan period.

Although the Council have made clear (in the "Foreword") that the Submission Draft Local Plan has come forward in time to avoid this significant step change in housing requirements, this does not conform with Central Government's commitment to increasing the supply of housing. Indeed this commitment to increasing the supply of housing should be reflected and carried through within Local Planning Policy. Indeed, irrespective of the key date of 31st March 2018, it follows that the standard methodology looks to a 75% increase in housing requirement. Demographic change will not stop and re-start on 1st April. Either the Council can artificially constrain or limit its Local Plan OR commit to an early review. However, each scenario renders the local Plan unsound through a failure to meet its OAN or the identification of Green Belt boundaries that require alteration at the next review. Both scenarios fail to address fundamental matters of sound planning practice.

Q7: Policy SP2 is currently unsound as it is not justified, positively prepared or effective. This policy should be deleted to exclude reference to sites located on open space within settlements:

"...

~~(iv) Sites located on open space within settlements where such selection would maintain adequate open space provision within the settlement;~~

..."

The inclusion of 11,400 new homes is also queried, given the recommendations in the SHMA (date) for 12,573 dwellings. Furthermore the Council have not sufficiently evidenced their position for proposing a lower number of new homes and therefore such a proposal should be considered unsound. Indeed the Council's proposal conflicts with National Government's central policy for increasing the supply of housing.



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Policy P4 Ongar

Q6: The Plan identifies Ongar as a Small District Centre and this policy identifies housing allocations for Ongar of approximately 590 dwellings. This policy should be amended to include land at London Road, Chipping Ongar (site ref: SR-0051) as a residential allocation for 250 dwellings. A site location plan is attached.

The Council's consideration of sites around Ongar in effectively four "zones" (north, east, south and west) is flawed and does not allow for full assessment of individual sites.

The Council's assessment of sites in 2016 excluded sites located on the eastern and southern sides of Ongar (including our representation site) on the basis that these were considered to be less suitable strategic options, making reference to the historic setting of Ongar and landscape sensitivity.

Since that time, the Council has decided to include sites on the southern side of Ongar, whilst recognising that these sites are "a greater distance from existing town centre amenities, public transport and community facilities, this strategic option provides opportunities for settlement expansion which would minimise harm to the Green Belt and largely avoid harm to the wider landscape around the settlement". This has led to the draft allocation of some sites to the south that were previously excluded as they fell within the areas that were considered to be less suitable strategic options at the last stage of the Local Plan (eg. ONG.R6 and ONG.R7). We have concerns about the suitability and deliverability of these sites.

The Submission Draft takes a revised approach and considers sites to the north, west and south of Ongar, but excludes sites that are identified as being to the east of the town. Although, our client's site (SR-0051) has been zoned as a site to the east of Ongar, it actually relates to the north side of the town. It shares the benefits of the other sites on the northern side of the town, which the Council has identified as being close proximity to the new secondary academy (Ongar Academy, located on Fyfield Road), and the existing primary school and health facility.

Within our representations to the Draft Local Plan 2016, we set out our comments regarding the assessment of individual sites around Ongar. A copy of these representations is attached for information, but in summary we objected to the non-inclusion of our clients land for the following reasons:

- Chipping Ongar is correctly identified as a town with a good range of services;
- We have no confidence in the thoroughness and therefore credibility of the Site Deliverability Assessment prepared by Arup, and the qualitative assessment conclusions, which have been challenged as above;
- There are no constraints to development at London Road that cannot be overcome by appropriate mitigation if required at planning application stage;
- The site can deliver housing within a short period of time, as well as contribute positively to the Council's community needs.

The Council's failure to publish its appendices to the Site Selection Report (2017), which is a crucial part of its evidence base that accompanies the Submission Draft Local Plan, means that we cannot evaluate the Council's latest assessment of individual sites and in particular its decision to include new sites on the southern side of Ongar. Due to this lack of information, it is not possible to see whether the Council has taken our comments (including suggested amendments to scoring of sites) into account, since this information is not currently available. We request the opportunity to comment on this information when it becomes available.

We have concerns in relation to a number of the proposed residential sites around Ongar and set out our comments in the table below. We reserve the right to update our comments once the Council make all of the supporting technical information available.

Site/s	Comments
ONG.R1 & R2	The Council identifies that these sites, which are proposed to deliver 234 dwellings have "potential access constraints" and that "vehicular access must be limited to a single access point for the two sites". In light of this, we query whether the proposals will deliver the 234 dwellings identified without adversely affecting highway safety, indeed the Arup report identifies no access issue for our client's land.
ONG.R3	This site is identified by the Council has being scrub / woodland and having "potential access constraints". Retention of existing trees, coupled with access issues may mean that the proposed density of 34dph may not be achievable. The constraints may affect the overall viability of the site and therefore deliverability is questioned.
ONG.R4	The overall number of dwellings at 163 is considered to conflict with the density and character of the surrounding environs. A proposal of 163 dwellings could result in a high density of 43dph thereby adversely affecting the character of Ongar. The proposed high density, and potentially inappropriate, form of development suggests that it is a viability requirement in order to secure delivery of the site.
ONG.R5	This site is identified in the SHLAA (July 2016) as having unknown availability as land ownership was unknown. It concludes that due to this, the site is not deliverable or developable. In spite of this it was included within the Draft Local Plan (October 2016) and in this Submission Draft (December 2017). What is the certainty that the landowner will wish to bring this site forward? In contrast, the site at London Road, Ongar (site ref: SR-0051) has an experienced developer on board and therefore there is certainty that this site can be delivered in the short term.
ONG.R6	The Submission Draft Local Plan recognises that sites to the south are a greater



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	distance from existing town centre amenities, public transport and community facilities. This site was previously excluded from the Draft LP 2016 and the justification for its inclusion at this late stage is queried.
ONG.R7	The Local Plan recognises that sites to the south are a greater distance from existing town centre amenities, and in general terms public transport and community facilities. The site also appears to have a high number of trees on the site which will act as a constraint to development and, in any event, the limited size of this site means that its contribution towards housing supply will be limited. This site was previously excluded from the Draft LP 2016 and the justification for its inclusion is queried.
ONG.R8	The Local Plan recognises that sites to the south are a greater distance from existing town centre amenities, public transport and community facilities. This site is the pub car park, with the pub itself being a locally listed building the setting of which new development could impact. The site was identified in the SHLAA (July 2016) as having unknown availability as land ownership was unknown. As stated above, the site at London Road(ref: SR-0051) has an experienced developer on board and therefore there is certainty that this site can be delivered in the short term.

Our clients' site at London Road is eminently suitable, available and achievable for development and as identified in our earlier representations (appended) and it scores well when assessed against other sites on the edge of Ongar.

The site would enable the existing harsh urban edge at this important gateway into Ongar to be softened and integrated into the countryside leading to an improvement in the character of the edge of the town; creating a new and defensible green belt boundary; and also allowing the existing Great Stony Park development to be integrated within the town rather than anomalously being left as green belt which is discordant with its more recent use for residential purposes. Indeed, the site provides for an opportunity to enhance the transition between countryside and urban form whilst strengthening and complementing the settlement pattern and character of Ongar to the benefit of the surrounding environs.

We submit that this site is actually on the northern side of Chipping Ongar, rather than the eastern side, and has good accessibility to a wide range of services and facilities (as recognised by the Council in relation to other sites on the northern side of Ongar). There are no constraints to development in this location that cannot be overcome by appropriate mitigation if required at the planning application stage. The site can deliver housing within a short period of time, as well as contribute positively to the Council's community needs.



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Q7: The policy should include reference to Land at London Road, Chipping Ongar (Site: SR-0051) as an allocation for approximately 250 dwellings. The policy should be amended as follows (for ease of reference our proposed additions are underlined):

“ ...

Residential Sites

B. In accordance with Policy SP2 the following sites are allocated for residential development:

...

(xx) ONG.R.xx Land off London Road – Approximately 250 homes.

...”

Policies Map: 5.8 Site Allocations in Ongar

Q6: For the reasons set out in our response to Policy P4, land at London Road, Chipping Ongar should be included as a residential allocation for approximately 250 dwellings.

Q7: Amend the Plan to include this site at London Road, Chipping Ongar (site ref: SR-0051).

Summary and Conclusions

We therefore object to the relevant sections and policies of the Submission Plan as highlighted above, and do not consider the Plan to be sound as a consequence as it relates to Ongar. The Plan should be amended by reordering the sequential site selection and take account of a site’s sustainability and should allocate our client’s land.

We trust that the above comments will be taken into account as the draft Local Plan is progressed and would welcome attending and contributing to the Examination.