



**Ongar Park Estate
Site Selection Assessment by
Deloitte**

November 2017

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Executive Summary

Epping Forest Local Plan – Spatial Strategy

- i. Epping Forest District Council (EFDC) published its Regulation 18 consultation version of the Epping Forest Local Plan in October 2016. The draft Local Plan's publication followed a period of 5 years gathering the evidence base to inform the proposed spatial strategy.
- ii. In 2014, EFDC commissioned Allies & Morrison (A&M) to undertake a Masterplanning Study (the "Study") for North Weald Bassett. The Study integrated previous studies into a wider masterplan for the village and identified a spatial framework to inform development options for the village.
- iii. The Study identified two spatial options for housing and employment development in North Weald Bassett, which were referred to as Scenario A and Scenario B. Scenario A proposed development to the north and south of the village, and Scenario B proposed development only to the north of the village.
- iv. Paragraph 5.103 of the draft Local Plan implies that significant weight should be applied to the findings of the Study even though it was only informed by 35 public feedback forms. We consider that the findings of such a small sample from the local community exhibition should not have been used by the

Council as evidence to justify the selection of Scenario B as the "more suitable strategic option" for growth in the village.

- v. Deloitte has been appointed to undertake an independent assessment of whether land to the south east of North Weald Bassett, identified by Allies & Morrison as sites 1C and 2D in the Study, and to assess whether that land should be allocated in the Epping Forest Local Plan to meet part of its identified need for housing in the District.

Epping Forest Local Plan – Site Selection Methodology

- vi. To inform site selection in the district, EFDC appointed consultants Arup to produce a Site Selection Methodology (SSM, 2016). The methodology informed Arup's Site Selection Report and the proposed housing allocations in the draft Local Plan.
- vii. A five stage methodology was used to determine the relative suitability of sites for housing within the district:
 - Stage 1 – Identify sites that would likely cause significant social, environmental or economic harm against six major policy constraints;
 - Stage 2 – Quantitative and qualitative assessment of sites to identify relative suitability for housing or employment

against Red-Amber-Green (RAG) rating system with 31 indicators;

- Stage 3 – Identify candidate preferred sites which best meet EFDC's preferred growth strategy;
 - Stage 4 – Identify sites which are deliverable;
 - Stage 5 – Undertake sustainability appraisal and habitats regulation assessment of the candidate preferred sites.
- viii. For North Weald Bassett, sites to the north and south of the village were assessed through the SSM. This process resulted in nine sites to the north of the village being proposed as allocated housing sites in Policy P 6 of the draft Local Plan.
 - ix. An area to the south of the village owned by Peer Group comprising 190 hectares (for more than 6,000 homes) was considered by Arup to be a "less suitable strategic option" at Stage 3 of the SSM, and was not considered for further testing. However, the Peer Group had not advanced the 190 hectare site for allocation.
 - x. Peer Group's representations to the Regulation 18 consultation of the draft Local Plan confirmed that it was promoting a significantly smaller 15 hectare site (the Promoted Site),

immediately adjoining the existing village, for south eastern expansion to provide approximately 300 new homes. In submitting its representations, Peer Group explained how the Council had made significant errors in the Council's consideration of the Ongar Park Estate sites.

Ongar Park Estate – Deloitte Assessment

- xi. Deloitte has been appointed to carry out an objective assessment of the Promoted Site adopting the Council's SSM, to test the site's relatively suitability for a housing allocation in the draft Local Plan.
- xii. Deloitte's assessment of the Promoted Site of Stages 1-4 of the SSM is summarised as follows:

Stage 1 – Major Policy Constraints

- xiii. The Promoted Site has no major policy constraints and therefore proceeds to Stage 2 of the assessment.

Stage 2 – Quantitative and Qualitative Assessment

- xiv. Our assessment of the Promoted Site against the 31 RAG indicators results in the following rating:
 - Major positive impacts – 1
 - Minor positive impacts – 8
 - Negligible impacts – 14

- Minor negative impacts – 8
- Major negative impacts – 0

xv. The Promoted Site scores better at the Stage 2 assessment than any other site in North Weald Bassett.

Stage 3 – Identify Candidate Preferred Sites

xvi. Stage 3 of the SSM is split into 4 steps.

- Step 1 is to identify reasonable spatial options to accommodate growth in each village. We conclude that a reduced south eastern expansion of North Weald Bassett should be identified as a suitable strategic option for growth in the village.
- Step 2 is to undertake a more detailed consideration of suitable spatial options for growth in each village. Sites were considered suitable or not suitable for development based partially on their performance in the Stage 2 RAG assessment, general member feedback, the Community Choices consultation and local knowledge/planning officer evaluation.
- Applying a scoring system to the indicators shows that the Promoted Site has the best aggregate score when compared against all other sites in North Weald Bassett. This scoring is significant, as the purpose

of the RAG analysis is “to identify the relative suitability of sites for housing” (paragraph 4.15 of the SSM). Our assessment of the Promoted Site demonstrates that it was suitable for further testing.

- Step 3 applies a sequential approach to testing sites’ suitability against criteria of flood risk, location and use of agricultural land. The Promoted Site’s ranking is superior to each of the sites to the north of the village that are proposed in the draft Local Plan, so proceeds to the next step.
- Step 4 categorises sites based on the results in Step 3, in order to identify which sites are most suitable for allocation.
- The Promoted Site would fall into Categories 3 and 4 “sites located within flood zone 1 and on land located on previously developed Green Belt land” and “sites located within flood zone 1 and on land of least value to the Green Belt adjacent to the settlement”. As such, it would be categorised higher than many of the sites to the north of the village that have been proposed for housing allocation in the draft Local Plan.
- The final step of Stage 3 is to assess the indicative capacity of the Promoted

Site which was assessed by A&M as part of the Study. In submitting its representations to the draft Local Plan, Peer Group confirmed the site’s capacity for 280 dwellings, in line with the capacity assessment undertaken by A&M.

Stage 4

- xvii. Stage 4 tests whether the sites remaining in the assessment are deliverable. We have completed the Land Promoter/Developer survey which demonstrates that the Promoted Site is available and deliverable for development. The site is in single ownership and has no land ownership or abnormal cost constraints to impede delivery for housing.

Summary

- xviii. We have carried out the evaluation of the Council’s site selection process for the Promoted Site in accordance the EFDC’s site selection methodology.
- xix. We have concluded that the Promoted Site passes each stage of the methodology, and is suitable and available to meet part of the District’s housing needs in North Weald Bassett.
- xx. We have confirmed that the Promoted Site is not subject to any major policy or environmental constraints and is located in an area that is spatially suitable for housing development as

part of the expansion of North Weald Bassett.

- xxi. The Promoted Site is in a sustainable location and has the least value to the Green Belt immediately adjacent to the settlement of North Weald Bassett. It can create a new defensible boundary for the Green Belt while maintaining the rectilinear shape of the village.
- xxii. The Promoted Site scores better in the sequential hierarchy than sites north of the village and it has been demonstrated that it is suitable, available and achievable for delivery housing development.
- xxiii. On this basis, we conclude that the Promoted Site should be allocated in the Submission Version of the Epping Forest Local Plan for 280 dwellings, and should be included in the Regulation 19 Consultation.

1. Introduction

Introduction to Deloitte's role

- 1.1 Deloitte has been appointed by London and Continental Development (Holdings) Ltd to undertake an independent assessment of whether land to the south east of North Weald Bassett should be allocated in the Epping Forest Local Plan to meet part of the identified need for housing in the District. London and Continental Development (Holdings) Ltd is a wholly owned subsidiary company of Peer Group plc ("Peer Group").
- 1.2 Our appointment follows the submission of representations to the Regulation 18 version of the draft Local Plan by Peer Group in December 2016. The representations related to the 15 hectare area of the Ongar Park Estate shown in Figure 1 (which we describe throughout this report as the "**Promoted Site**"). Peer Group's representations demonstrated the case for why the Promoted Site should be allocated for residential development in the emerging Local Plan.
- 1.3 Sections 2 and 3 of this report describe the history and background to the Local Plan and the site selection evaluation and process undertaken by Epping Forest District Council ("EFDC"), including the Council's approach to the assessment of a much larger part of the Ongar Park Estate.
- 1.4 Section 4 sets out our approach to taking the Promoted Site through each stage of the Council's site selection process and determining if the Promoted Site should be allocated for residential development in the Local Plan.
- 1.5 We conclude in Section 5 by confirming that the Promoted Site passes each stage of the site selection process and that it should be allocated for housing.



Figure 1: Aerial photograph showing the boundary of the Ongar Park Estate Promoted Site

2. Epping Forest Local Plan – Spatial Strategy

Planned distribution of new homes

- 2.1 EFDC published its Regulation 18 consultation version of the Epping Forest Local Plan in October 2016. The draft plan's publication followed a period of 5 years gathering the evidence base to inform the plan. This process included an assessment of housing opportunities in Epping Forest District, informed by a Strategic Land Availability Assessment carried out by Nathaniel Lichfield & Partners in 2008 (updated in 2010, 2012 and 2016).
- 2.2 This work fed into the preparation of a spatial strategy and informed a site selection exercise undertaken by the Council and its advisers, Arup and Allies & Morrison, to identify potential sites for future housing development.
- 2.3 Draft Policy SP 2 Spatial Development Strategy 2011-2033 of the draft Local Plan (page 40) sets out the EFDC housing target to build 11,400 net new homes over the plan period to 2033 (518 per annum). The planned distribution for new homes within Epping Forest District is shown in Figure 2. Of the proposed 11,400 homes, 3,900 homes have been allocated for sites in and around Harlow, with the remaining homes to be distributed in parishes across the Epping Forest District, including 1,580 new

homes in North Weald Bassett.

- 2.4 Within this report, we do not analyse or challenge the Council's assessment of housing need nor the proposed distribution of housing to settlements.
- 2.5 Paragraph 3.54 of the draft Local Plan (page 38) sets out the sequential approach adopted by the Council to identify and allocate the most appropriate sites in each settlement in accordance with the following order of priorities:
1. *"A sequential flood risk assessment – proposing land in Flood Zone 2 and 3 only where need cannot be met in Flood Zone 1"*
 2. *Sites located on previously developed land within settlements*
 3. *Sites located on open space within settlements where such selection would maintain adequate open space provision within the settlement*
 4. *Previously developed land within the Green Belt (in anticipation of the NPPF being updated to take account of the proposed changes published in December 2015).*
 5. *Greenfield/Green Belt land on the edge of settlements:*
 - i. *Of least value to the Green Belt if the land meets other suitable criteria for development.*
 - ii. *Of greater value to the Green Belt if the land meets other suitable criteria for*

Sites around Harlow	~ 3,900
Buckhurst Hill	~ 90
Chigwell	~ 430
Chipping Ongar	~ 600
Coopersale	~ 50
Epping	~ 1,640
Fyfield	~ 90
High Ongar	~ 10
Loughton	~ 1,190
Lower Sheering	~ 30
Nazeing	~ 220
North Weald Bassett	~ 1,580
Roydon	~ 40
Stapleford Abbots	~ 10
Sheering	~ 120
Theydon Bois	~ 360
Thornwood	~ 130
Waltham Abbey	~ 800

Figure 2: Proposed housing development in Epping Forest (EFDC emerging Local Plan, Policy SP 2 – p.40)

- development.
- iii. *Of most value to the Green Belt if the land meets other suitable criteria for development.*
- 6. *Agricultural land:*
 - i. *Of Grade 4-5 if the land meets other suitable criteria for development.*
 - ii. *Of Grade 1-3 if the land meets other suitable criteria for development.*
- 7. *Enable small scale sites in smaller rural communities to come forward where there is a clear local need which supports the social and economic well-being of that community”.*
- 2.6 Draft Policy SP 2, Chapter 5 “Places” of the draft Local Plan (page 117) further sets out the vision and policies for settlements and town centres within the district. North Weald Bassett is identified in Figure 5.1 as one of five “large villages” in the district. The table in Policy SP 2 identifies North Weald Bassett as second only to the town of Epping in the proposed scale of housing development to be delivered in each settlement.
- 2.7 Paragraph 5.5 explains that the Council has identified potential sites for residential development, which have been:

“identified following a rigorous application of the site selection methodologies and represent those sites the Council considers to be suitable, available and achievable within the plan period based on available information.”
- 2.8 Paragraph 5.103 introduces the Council’s approach to selecting sites for housing

in North Weald Bassett. It explains that previous studies were integrated into a masterplan for the village which was prepared for the Council by Allies & Morrison (A&M) in 2014. Paragraph 5.103 confirms that the content of A&M masterplan informed the proposals within the draft Local Plan and was reported to Cabinet in October 2014, following a public exhibition.

- 2.9 Paragraph 5.105 summarises the feedback received on the A&M Masterplanning Study in 2014. We describe that process and its outcome on the following pages of this report.
- 2.10 Paragraph 5.108 introduces the Council’s vision for North Weald Bassett, which incorporates the findings of the Masterplanning Study as well as those identified through further stakeholder engagement and evidence based documents:

“Vision for North Weald Bassett

North Weald Bassett will seek to become more self-sufficient while retaining its local character, including military heritage. Future development will be located to the northern side of the village, maximising opportunities at the airfield and surrounding land to deliver aviation related use complimented by a mix of employment, leisure and residential uses. The further development will be supported by improved health, education and leisure services, strengthened local retail offer and enhanced sustainable and public transport provision.”

- 2.11 Paragraphs 5.109-5.113 describe the Council’s “preferred approach” to

achieving this vision as “Scenario B” in the Masterplanning Study. Paragraph 5.110 states:

“The Study concluded that the most suitable option was Scenario B, which promotes development to the north of the settlement, which is a less sensitive location in landscape terms and promotes a more compact settlement pattern.”

- 2.12 The following pages describe the Council’s approach to the selection of Scenario B.

North Weald Bassett Masterplanning Study

2.13 In 2014, EFDC commissioned Allies & Morrison (A&M) to undertake a Masterplanning Study ("the Study") for North Weald Bassett. The Study integrated previous studies into a wider masterplan for the village and identified a spatial framework to inform development options for the village. The Study was published in September 2014.

2.14 A&M introduces the Study:

"Allies & Morrison Urban Practitioners were commissioned by Epping Forest District Council to undertake a masterplanning study for North Weald Bassett, to identify a vision for the settlement and to provide a clear framework for future development and investment."

2.15 Sections 2 and 3 of the Study provide background information including social, economic, transport and demographic data. In the period 2001 to 2011, the population of North Weald Bassett increased from 4,461 people to 4,477 (an increase of 16 people). This suggests that the Green Belt constrains development and economic growth in the village.

2.16 The Study reported that, in January 2014, a Community Workshop session was held at North Weald Village Hall, attended by 85 people. Page 81 identifies the key issues involved in provision of new homes:

"People were fearful that too much or the wrong type of new development would cause the settlement to lose its character

and village-feel, so any new development would have to be of an appropriate scale and density to reflect North Weald Bassett's existing characteristics."

2.17 Section 5 of the Study introduces the development principles for shaping the settlement's future. It describes the existing pattern of development as:

"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 North Weald Bassett to preserve and enhance the benefits it brings to its residents."

2.18 The following development principles are described as informing development through building on "the settlement's positive attributes while creating new opportunities for the future":

- *"Preserve the discrete 'village-like' character of North Weald Bassett*
- *Preserve and enhance settlement's relationship to the Greenbelt/countryside*
- *Consolidate the structure of the settlement to make it more 'walkable' and accessible*
- *Increase the range and quantity of local shops, leisure and community facilities, both in an augmented centre, and in other convenient locations elsewhere*
- *Increase the range of types and quality of*

employment space within the settlement

- *Enhance the context of North Weald Airfield to help stimulate additional uses and activities which benefit residents*

- *Improve the quality of local public transport links and mitigate present highways issues"*

2.19 Section 6 of the Study identified two spatial options for housing and employment development in North Weald Bassett. The spatial options were referred to as Scenario A and Scenario B (shown on Figures 4 and 5 on the next pages). Scenario A proposed development to the north and south of the village, and Scenario B proposed development only to the north of the village.

2.20 Each scenario included three options, for low, medium and high growth in the village, based on the following ranges:

- Low growth – 458-463 dwellings;
- Medium growth – 1,021-1,202 dwellings; and
- High growth – 1,540-1616 dwellings.

2.21 In introducing the growth scenarios on page 115, the Study states that "*new development is focused close to the existing commercial centre and integrated with the existing street pattern to strengthen and support the commercial centre*". This suggests that Option 1 in each scenario should be treated as utilising the most sustainable sites in the village.

2.22 It is not explained why Scenario B excluded land to the south of the

village nor why there was not a third scenario, for expansion of the village only to the south. A&M's options for each scenario are summarised in tables on the following pages, alongside Figures 3 and 4.

2.23 It is also not explained why Scenarios A and B show different approaches to placing sites to the north of the village in each growth option, nor why the shape of some of the sites has changed between the scenarios.

North Weald Bassett Masterplanning Study
Scenario A – growth to north and south of the village



Figure 3 : Allies & Morrison North Weald Bassett Masterplan Scenario A Parcels 1C and 2D (2014)

	Developable area	Net number of dwellings
Option 1	21.90 ha	478
Option 2	48.67 ha	1,021
Option 3	74.37 ha	1,540

North Weald Bassett Masterplanning Study
Scenario B – growth to north of the village only

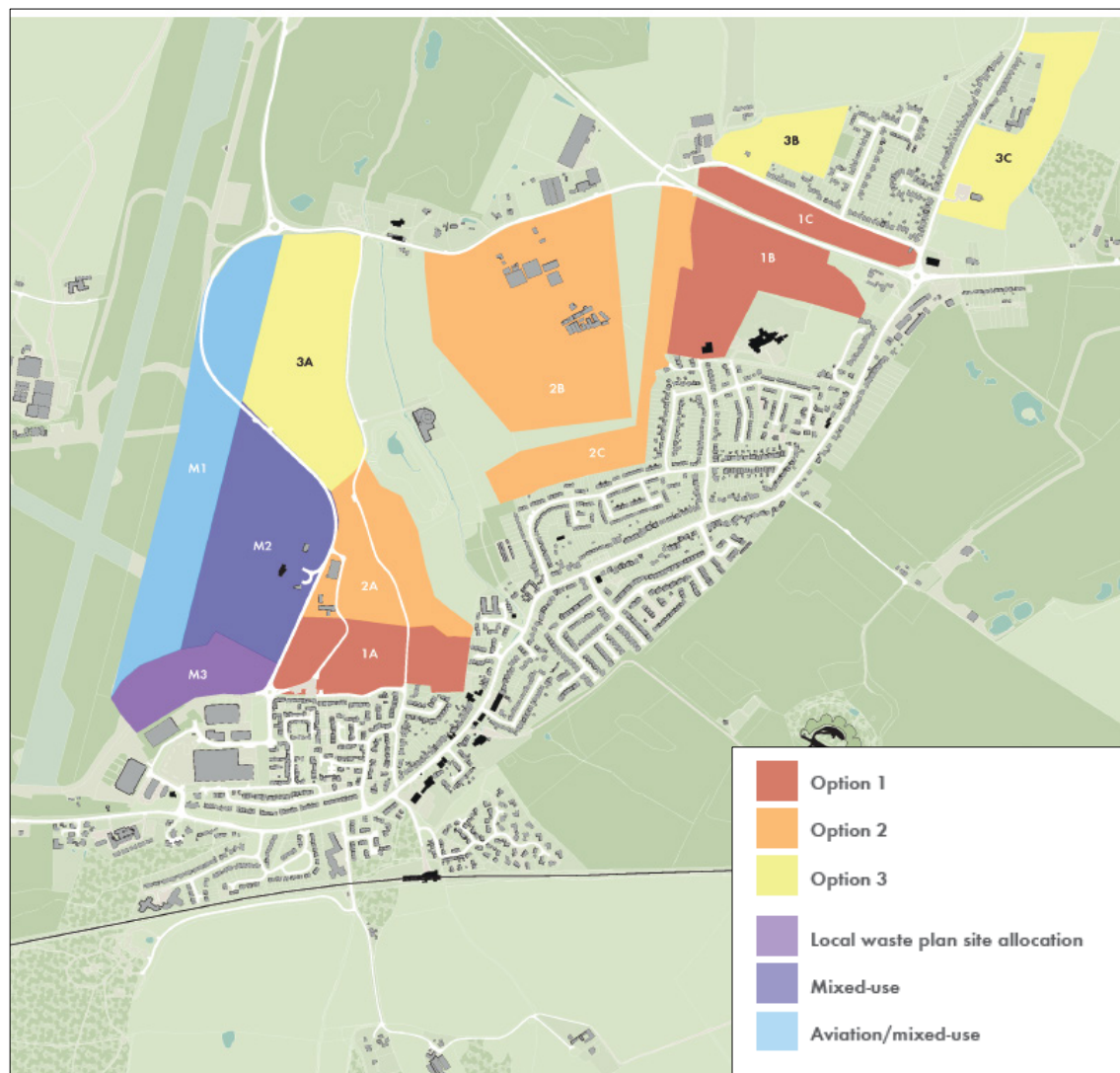


Figure 4: Allies & Morrison North Weald Bassett Masterplan Scenario B (2014)

	Developable area	Net number of dwellings
Option 1	19.58 ha	463
Option 2	54.33 ha	1,202
Option 3	75.87 ha	1,616

Exhibition on the Masterplanning Study

2.24 Scenarios A and B of A&M's Study were subject to a community exhibition in June 2014, which was attended by approximately 160 people. The Study confirms that 35 feedback forms were returned, along with 9 written representations.

2.25 The community was asked the following six questions:

1A. Do you agree with the principles for new development?

1B. Are there any other principles you think should be included?

2. How do you feel about scenario B (no growth to the south-east of the settlement) and associated options?

3. How do you feel about scenario A (growth to the south of the settlement) and associated options?

4. Which do you prefer of scenario A and scenario B?

5. Do you have any other comments?

2.26 In response to Question 4, the Study states that 20 respondents showed a preference for Scenario B and 8 favoured Scenario A. 7 response forms showed no preference for either scenario or option.

2.27 We understand Peer Group has requested that the Council and A&M provide copies of the feedback forms from the exhibition. The Council has explained that neither it nor A&M have retained copies of the feedback forms, although there has been no explanation of the failure to retain the forms.

2.28 From the very few members of the community who attended the exhibition and the very small sample who responded to the questionnaire, page 143 of the Study summarised the outcome of the consultation exercise:

"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 of the area. Respondents identified that any development should be sustainable in all aspects; and should be in proportion to the existing settlement, retaining a village context rather than establishing a town capacity."

2.29 We understand that the Council has no record of who attended the exhibition and no demographic data of the age, gender and address of the attendees.

2.30 Following its completion, the Study was reported to EFDC's Cabinet on 6th October 2014. The study was presented for Cabinet members to note, and to accept that it should form part of the

Local Plan Evidence Base.

2.31 No decisions were taken by the Cabinet about the preferred scenario for growth in North Weald Bassett.

2.32 Even though the Study was informed by only 35 feedback forms and was only noted by the Cabinet, paragraph 5.103 of the draft Local Plan implies that significant weight should be applied to the findings of the Study when it states:

"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."

2.33 Paragraph 5.105 of the draft Local Plan implies further weight should be added to the outcome of the consultation process, when it states:

"Feedback received to the consultation on the proposals contained in the North Weald Bassett Masterplanning Study included:

- support for the proposed principles for new development;*
- Scenario B (with no growth to the south of the settlement) was identified as the*

preferred approach for new development in the village; and

- future development should be supported by improvements to transport infrastructure and local services such as healthcare and schools."*

2.34 As explained in Section 4, we consider that the findings of such a small sample from the local community exhibition should not have been used by the Council as evidence to justify the selection of Scenario B as the "more suitable strategic option" for the expansion of North Weald Bassett.

3. Epping Forest Local Plan – Site Selection Methodology

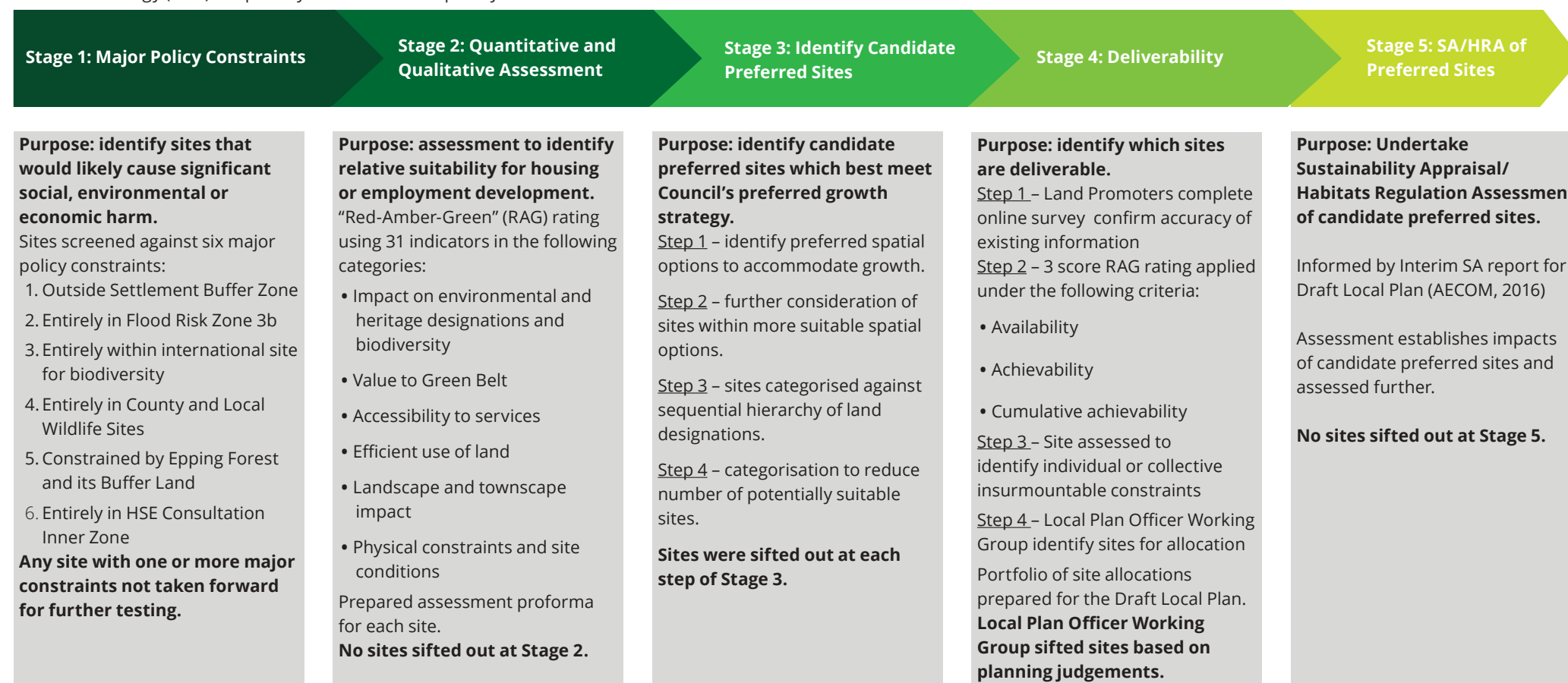
Arup Site Selection Methodology

3.1 Paragraph 5.5 of the draft Local Plan claims that the Council has undertaken a rigorous site selection approach to selecting sites to accommodate growth. We set out below a summary of the 2016 Site Selection Methodology (SSM) adopted by EFDC and developed by

its consultants Arup. The methodology set out in the SSM was used to inform Arup's Site Selection Report (SSR, 2016).

3.2 The SSR forms a key component of the evidence base for site selection for housing and employment in

Epping Forest and North Weald Bassett. A five stage methodology was used to determine the relative suitability of sites for housing within the district. For the purposes of this report, we adopt the same methodology, but we also make some observations about its approach.



North Weald Bassett – potential residential sites

- 3.3 Appendix B1.5.2 of Arup's Site Selection Report (SSR) includes a map of sites that were assessed to accommodate potential growth in North Weald Bassett (Drawing No. EFDC-53-0014-Rev 1).
- 3.4 The map is shown in our Figure 5 opposite and at full size in Appendix 1. It illustrates how potential residential sites in North Weald Bassett were assessed during the various steps of Stage 3 of the Site Selection Methodology (SSM).

Stage 3, Step 1

- 3.5 The map identifies the area to the north of the village that was considered to be the "more suitable strategic option" for housing growth (denoted by the green line), based on the following conclusion:

"Scenario B, as set out in the North Weald Bassett Masterplanning Study, was judged to be the most suitable. It is in a less sensitive location in landscape terms and promotes a more compact settlement pattern."

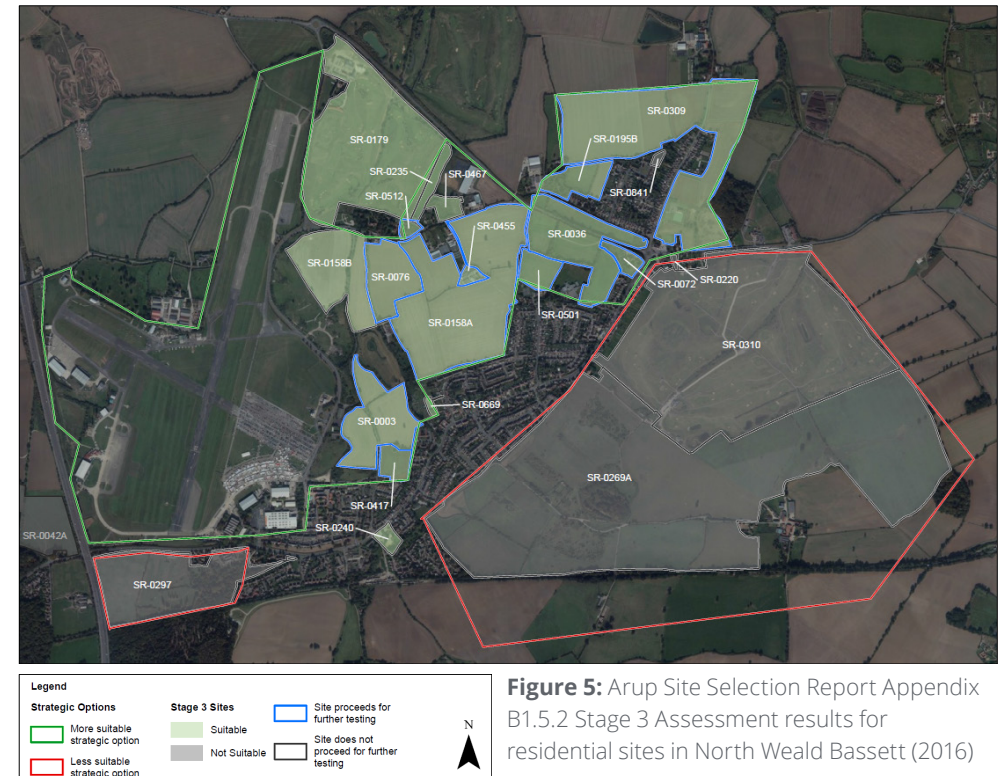
- 3.6 As a result the sites in the area to the north of the village were taken forward to the next step of assessment.
- 3.7 The area to the south of the village comprising 190 hectares (for more than 6,000 homes) was considered by Arup to be a "less suitable strategic option" (denoted by the red line). This area was judged by Arup to be not suitable for further testing. However, Peer Group

was promoting a smaller 15 hectare site for south eastern expansion of the village. This smaller area was not assessed by Arup as part of the SSM process.

- 3.8 We describe the Council's approach to assessing the 190 hectare area denoted by the red lines in Figures 8 and 9 on page 14.

Stage 3, Step 2

- 3.9 Step 2 of Stage 3 comprised further consideration of those sites to the north of the village denoted by the green line.
- 3.10 As a result, the sites outlined in blue progressed for further testing in the remainder of Stage 3, and in Stages 4 and 5.
- 3.11 At the conclusion of the SSM, most of the sites outlined in blue were included in the draft Local Plan as proposed site allocations for North Weald Bassett (as described on the following page).
- 3.12 Section 4 of our report includes detailed comments on each step of the Council's approach to selecting these sites.



Proposed Site Allocations for Residential Growth in North Weald Bassett

3.13 Based on the outcome of the Council's site selection process for North Weald Bassett, paragraph 5.111 (page 150) of the draft Local Plan states that:

"Following an assessment of the suitability, availability and achievability of residential sites within the spatial extent of [North Weald Bassett] Scenario B spatial option, the Council has identified eight sites outside of the airfield for the potential allocation of 1,360 homes. In addition, the Council considers it may be possible to accommodate around 225 homes on parts of the airfield identified for residential use in the [Masterplanning] Study subject to more detailed testing. The locations for these homes are illustrated in Figure 5.15."

3.14 Figure 5.15 (our Figure 6) of the emerging Local Plan illustrates the proposed employment space and housing allocation for North Weald Bassett, in addition to the indicative alterations to the Green Belt boundary. All of the proposed allocated sites are to the north of the village.

3.15 Draft Policy P 6 North Weald Bassett identifies each proposed residential site and the number of homes for each site:

- "SR-0003 (fields east and west of Church Lane, north of Lancaster Road) – approximately 276 homes;*
- SR-0036* (land at Blumans Farm, west of*

- Tylers Green) – approximately 288 homes;*
- SR-0072 (land at Tylers Farm, High Road) – approximately 21 homes;*
- SR-0119 (land at North Weald Airfield) – approximately 225 homes;*
- SR-0158A (land south of Vicarage Lane) – approximately 590 homes;*
- SR-0195B (land to the north of Vicarage Lane) – approximately 91 homes;*
- SR-0417 (land east of Church Lane/west of Harrison Drive) - approximately 49 homes;*
- SR-0455 (Chase Farm Business Centre, Vicarage Lane West) – approximately 27 homes; and*
- SR-0512 (St Clements, Vicarage Lane West) – approximately 11 homes."*

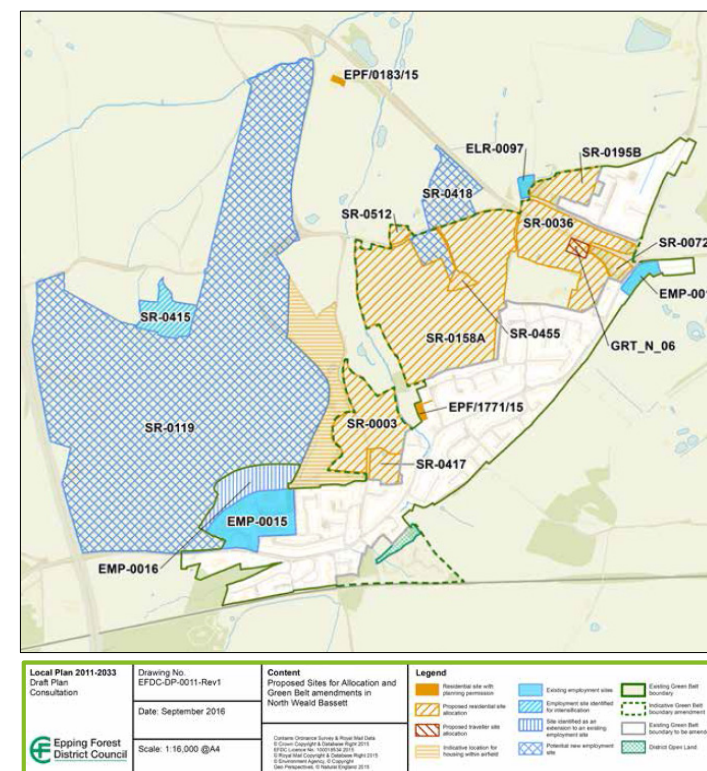


Figure 6: Figure 5.15 Proposed Site Allocations for North Weald Bassett (EFDC emerging Local Plan, Figure 5.15)

Ongar Park Estate – Arup site selection process for the Assessed Sites: SR-0269A & SR-0310

3.16 Sites SR-0269A (Figure 8) and SR-0310 (Figures 7 and 8) (the “Assessed Sites”) comprise part of the Ongar Park Estate to the south of the village. Both sites were assessed for EFDC in Arup’s Site Selection Report.

3.17 We summarise Arup’s approach to the Assessed Sites in the SSR as follows:

- Stage 1 – no major constraints identified.
- Stage 2 – tested two large sites of Ongar Park Estate with combined area of 190 hectares for 6,018 homes (compared to the planned distribution for new homes in the draft Local Plan to North Weald Bassett of 1,580 homes). This resulted in extensive negative scoring on issues such as use of agricultural land and landscape sensitivity.
- Stage 3, Step 1 – the EFDC Local Plan Officer Working Group deemed that the more suitable spatial option for North Weald Bassett was Masterplan Scenario B to the north of the village. Southern expansion of the village was deemed by the Officer Working Group to be a “less suitable strategic option”. Sites in the southern expansion area (including Sites SR-0269A and SR-310)

were sifted out at Stage 3, Step 1 for the following reason:

“This option would represent an unsustainable pattern of settlement growth beyond its existing rectilinear edge, constituting sprawl. Growth in this direction was not supported as part of the preparation of the North Weald Bassett Masterplanning Study.”

3.18 On this basis, the 190 hectare Ongar Park Estate Assessed Sites did not proceed for further testing.



Figure 7: Assessed Site SR-269A (EFDC Site Selection Report, September 2016)



Figure 8: Assessed Site SR-0310 (EFDC Site Selection Report, September 2016)

Local Plan representations by Peer Group plc – the Assessed and Promoted Sites

3.19 Following the assessment of Sites SR-0310 and SR-0269A (the “Assessed Sites”), Peer Group submitted detailed representations to the Regulation 18 consultation version of the draft Epping Forest Local Plan.

3.20 In submitting its representations to the draft Local Plan, Peer Group explained how the Council had made significant errors in the Council’s consideration of the Ongar Park Estate sites. In submitting the representations on behalf of Peer Group, Hogan Lovells’ letter dated 12th December 2016 stated:

“The OPE has not been identified by the Council as a proposed allocation for housing in the Local Plan. However, as the representations make clear, due to a misunderstanding between the landowner and the Council as to the extent of land and the scale of development being promoted for site allocation, we consider that significant errors have been made in the Council’s assessment of OPE. As a result it is clear that the Council’s evidence base and its site allocations in North Weald Bassett will need to be reconsidered in order to ensure a sound Local Plan process. The errors are set out in the representations, but in summary they comprise:

1. The extent/area of land being promoted for development;

- 2. The scale of development being proposed;*
- 3. Misinterpretation of the consultation feedback received by the Council, to the North Weald Masterplanning Study (Allies & Morrison September 2014);*
- 4. Failure by the Council to follow its own sequential strategy for site allocations as contained in the draft Local Plan (paragraph 3.54).*

As a result of the above, the Council has misdirected itself in respect of:

- The Settlement Pattern;*
- The Green Belt;*
- Agricultural Land;*
- Landscape;*
- BAP Priority Species or Habitats; and*
- The setting of the Ongar Park Redoubt.”*

3.21 Peer Group’s representations presented detailed justification for selecting the smaller parts of the Ongar Park Estate in accordance with the A&M Masterplanning Study (Sites 1C and 2D). For the remainder of this report we refer to Sites 1C and 2D as the “Promoted Site”.

3.22 A comparison of the scale of the Assessed Sites and Promoted Site is shown on the combined site plan prepared by Liz Lake Associates, which was included in Peer Group’s

representations to the draft Local Plan (Figure 9).

3.23 The plan shows that the Promoted Site (identified by the area shaded dark red on Figure 9) represents a much smaller area of land to the south east of the village. The Promoted Site has an area of 15 hectares for approximately 300 homes, compared with the Assessed Site’s area of 190 hectares (which the Council has assessed to have a potential capacity of 6,108 homes).

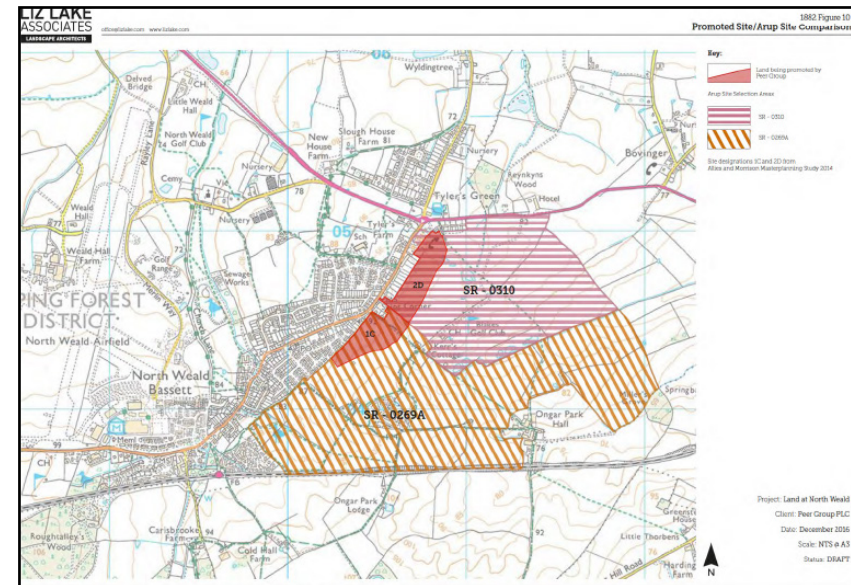


Figure 9: Liz Lake Associates Combined Site Plan (2016) used in Hillbreak Sustainability Report

4. Ongar Park Estate – Deloitte Assessment of Site Selection Methodology

Ongar Park Estate – the Promoted Site

4.1 In this section, we describe Deloitte's approach to undertaking an independent assessment of how the Promoted Site should have been considered at each stage of the EFDC Site Selection Methodology.

4.2 We have adopted the stages described in Arup's Site Selection Report, and summarised on page 13 above, as follows:

- Stage 1 – Major Policy Constraints
- Stage 2 – Quantitative and Qualitative Assessment
- Stage 3 – Identify Candidate Preferred Sites
 - Step 1 – identify preferred spatial options
 - Step 2 – further consideration of sites within more suitable spatial options
 - Step 3 – sites categorised against sequential hierarchy of land designators
 - Step 4 – categorisation to reduce number of potentially suitable sites
- Stage 4 – Deliverability
- Stage 5 – Sustainability Appraisal



Figure 10: Aerial photograph of the Promoted Site.

Stage 1

Major Policy Constraints

- 4.3 Table 1 sets out the Stage 1 assessment of the Promoted Site against the six Major Policy Constraints outlined in the SSM. Paragraph 4.5 of the SSM states:

“The purpose of Stage 1 will be to identify any sites that are subject to major policy constraints identified in the NPPF, or by reference to local considerations, such that development of the candidate site would likely cause significant social, environmental or economic harm in accordance with paragraph 152 of the NPPF.”

- 4.4 The assessment shows the Promoted Site to have no major policy constraints.

Output from Stage 1: the Promoted Site passes to Stage 2

Major Policy Constraint	Deloitte Assessment
Site located outside Settlement Buffer Zone	No constraint – Settlement Buffer Zones are defined by distance from key services. North Weald Bassett is designated as a large village within the Housing Settlement Hierarchy Technical Paper (paragraph 4.4). Its buffer is therefore defined as 1km from key services, which the Promoted Site sits within.
Entirety of site located in Flood Risk Zone 3b	No constraint – the Environment Agency flood map shows the Promoted Site to be entirely unconstrained by Flood Zone Risk 3b.
Site entirely located in an international site for biodiversity	No constraint – Natural England open data confirms that there are no designated international sites for biodiversity on the Promoted Site.
Site entirely located in County and Local Wildlife Sites	No constraint – the assessment carried out by Liz Lake Associates for Peer Group identifies that Local Wildlife Sites are located away from the Promoted Sites.
Site constrained by Epping Forest and its Buffer Land	No constraint – the Epping Forest Buffer Zone is defined on the City of London's Epping Forest Map. North Weald Bassett is 10km from Epping Forest and significantly outside its buffer zone.
Site entirely located in HSE Consultation Inner Zone	No information for the Promoted Sites. No constraints were found in Arup Site Selection Report for the Assessed Sites.

Table 1: Stage 1 Assessment of the Promoted Site

Stage 2 – Quantitative and Qualitative Assessment of the Promoted Site

- 4.5 We have tested the Promoted Site against the 31 criteria adopted by Arup, using the Red-Amber-Green (RAG) rating system for the SSR, to identify the relative suitability of the site for housing development.
- 4.6 Our assessment of the Promoted Site against these indicators is set out in the following tables.

(++)	Major Positive Impact	(+)	Minor Positive Impact	0	Negligible Impact	(-)	Minor Negative Impact	(--)	Major Negative Impact	++	1
										+	8
										0	14
										-	8
										--	0

Criteria		Proposed Allocation (Site 1C & 2D)	
		Site 1C & 2D	Deloitte Reasons for Revision
1.1 Impact on Internationally Protected Sites	0		Figure 2 of the 2016 Green Belt Review Sites and Boundaries Study produced by LLA confirms that the Promoted Site does not contain any Internationally Protected Sites. Therefore a negligible effect score has been given.
1.2 Impact on Nationally Protected sites	0		The Environmental Issues Report by LLA outlines that the Promoted Site would not impact on a Nationally Protected Site. The Promoted Site has therefore being given a negligible effect score.
1.3a Impact on Ancient Woodland	0		The Promoted Site is not located within the 250m buffer range of an Ancient Woodland, therefore a negligible effect score has been given.
1.3b Impact on Ancient/Veteran Trees outside of Ancient Woodland	0		The Arup SSR outlines that the Assessed Sites do not contain either Ancient or Veteran Trees. The Promoted Site is contained wholly within the Assessed Sites, therefore we can conclude no ancient or veteran tree are present. Therefore a negligible effect score has been given.
1.4 Impact on Epping Forest Buffer Land	0		The Promoted Site is located over 10km from Epping Forest and significantly outside the City of London's Epping Forest buffer zone, therefore a negligible score has been given.
1.5 Impact on BAP Priority Species or Habitats	(-)		The Environmental Issues Report produced by LLA confirms that only a minor negative impact would be likely, noting that features and species on the site cannot be protected in their totality but effects can be mitigated [table 9 paragraph, 7.1.2]. Therefore a minor negative score has been given in line with the LLA's recommendation.
1.6 Impact on Local Wildlife Sites	0		The Environmental Issues Report produced by LLA confirms that the Promoted Site has no Local Wildlife Sites within its extent and notes the opportunities to enhance the existing features on the site [table 9 paragraph, 7.1.2]. The Promoted Site has therefore been given a negligible effect score.
1.7 Flood risk	(++)		The Environment Agency flood map shows the Promoted Site to be entirely unconstrained by Flood Zone Risk 3B and is entirely located in Flood Zone 1. The Promoted Site has therefore being given a major positive effect score.
1.8a Impact on heritage assets	0		The Heritage Assessment undertaken by Peter Stewart Consultancy confirms that development on the Promoted Site would not result in harm to the Redoubt or its setting [Paragraph 5.5]. The Promoted Site is also located outside of the North Weald Redoubt buffer illustrated on page 118 of the North Weald Bassett Masterplan. Therefore a negligible effect score has been given.

Criteria	Proposed Allocation (Site 1C & 2D)	
1.8b Impact on archaeology	0	The 2012 Land at Ongar Park report produced by consultants Capita Symonds confirms that a broader area of the Ongar Park Estate - which includes the Promoted Site - has no recorded archaeological finds of significance [page 19]. The Promoted Site has therefore been given a negligible effect score.
1.9 Impact on air quality	(-)	An Air Quality Assessment has not been undertaken for the Promoted Site. Therefore a conservative rating of a likely minor negative effect score has been given as a 'worst case' scenario. The score is in line with the Hillbreak Sustainability Assessment and the Assessed Site SR-0310.
2.1 Level of harm to Green Belt	(-)	The Ongar Park Estate Green Belt Review produced by LLA confirms that when assessing the Promoted Site a minor negative effect rating is likely in relation to the level of harm to the Green Belt [paragraph, 4.1.12].
3.1 Distance to the nearest rail/tube station	(-)	The Promoted Site is located approximately 5.5km from Epping Underground Station. Sites 4km or more away from a rail tube station score a minor negative effect.
3.2 Distance to nearest bus stop	(+)	The Promoted Site is located within 400m of bus stops on High Road, therefore a minor positive effect score has been given.
3.3 Distance to employment locations	(+)	The Promoted Site is located within 1600m of a number of employment locations in North Weald Bassett as the site abuts the settlement edge. The Promoted Site has therefore been given a minor positive effect score.
3.4 Distance to local amenities	(+)	The Promoted Site is less than 1000m from nearest large village, therefore a minor positive effect score has been given.
3.5 Distance to nearest infant/primary school	(+)	The Promoted Site is wholly within 1000m of St. Andrews Primary School, therefore a minor positive effect score has been given.
3.6 Distance to nearest secondary school.	(-)	The Promoted Site is approximately 10.5km from the nearest secondary school, St. Nicholas School, Harlow. Therefore a minor negative effect has been given.
3.7 Distance to nearest GP surgery	(+)	The Promoted Site is less than 1000m from North Weald Surgery when adopting the same methodology as the Arup Site Selection Report. The Promoted Site has therefore been given a minor positive effect score.
3.8 Access to Strategic Road Network		This indicator is only applicable to employment sites.
4.1 Brownfield and Greenfield Land	(-)	A Radio Masts Plan shows much of the Promoted Site to be previously brownfield land housing radio masts for the Marconi radio station. Much of this land is now regarded as reclaimed greenfield land but existing concrete structures which supported the masts still exist on the Promoted Site. The Promoted Site has therefore been given a minor negative effect rating.

Table 2: RAG analysis for the Promoted Site

Criteria		Proposed Allocation (Site 1C & 2D)
4.2 Impact on agricultural land	0	A desk based assessment using Natural England's Land Classification Eastern Region Map found that the development of the Site would not result in the loss of agricultural land. The Promoted Site has therefore been given a negligible effect score.
4.3 Capacity to improve access to open space	(+)	The Environmental Issues Report produced by LLA confirms that when assessing the smaller Promoted Site the wider OPE site provides potential opportunity to enhance public open space [table 9 paragraph, 7.1.2]. The Promoted Site has therefore been revised to a likely minor positive effect score in line with the LLA Report recommendation.
5.1 Landscape sensitivity	0	The Environmental Issues Report produced by LLA confirms that Sites 1C falls in an area of low landscape sensitivity and Site 2D falls within an area of medium landscape sensitivity [table 9 paragraph, 7.1.2]. The Promoted Site has therefore been given a negligible effect score in line with LLA's recommendation.
5.2 Settlement character sensitivity	(+)	The Promoted Site runs parallel, and provides a natural extension to, the existing settlement and houses facing on to the south side of High Road. The existing settlement edge is characterised by private gardens with young trees and buses beyond providing a harsh settlement edge. It has been given a minor positive rating.
6.1 Topography constraints	0	The Environmental Issues Report produced by LLA confirms that the Promoted Site does not have topographical constraints. The Promoted Site has therefore been given a negligible effect score in line with the LLA Report recommendation.
6.2a Distance to gas and oil pipelines	0	In line with Arup assessment a likely negligible score has been given.
6.2b Distance to power lines	0	In line with Arup assessment a likely negligible score has been given.
6.3 Impact on Tree Preservation Order (TPO)	0	The Arup SSR and the Environmental Issues Report undertaken by LLA identify that there are no impacts on TPO's on the Assessed Sites or the Promoted Site. Therefore a likely negligible score has been given.
6.4 Access to site	(+)	The Promoted Site can be accessed from various access points in North Weald Bassett. Potential access options include April Rise which splits parcels 1C and 2D. Two further points from High Road and the private road off Epping Road leading to Blakes Golf Course clubhouse serve Parcel 2D. Thornhill to the south of the Promoted Site serves Parcel 1C. The Promoted Site therefore scores a minor positive effect.
6.5 Contamination constraints	(-)	The Arup SSR indicates that the Assessed Sites have potential contamination which could be mitigated, with both scoring a likely minor negative effect. The impact of contamination on the Promoted Site is currently unknown and can only be informed by the Arup SSR. Therefore a likely minor negative effect score has been given.
6.6 Traffic impact	(-)	The impact on traffic for the Promoted Site is currently unknown and as such a Transport Assessment will need to be undertaken. Therefore it has been scored a minor negative effect rating in line with the Assessed Sites SR-0310.

Output from Stage 2: the Promoted Site automatically progresses to Stage 3

Stage 3 – Step 1

Identify reasonable spatial options to accommodate growth in North Weald Bassett – South Eastern Expansion

4.7 The purpose of Stage 3, Step 1 of the SSM is to identify reasonable spatial options from which sites are assessed further. Spatial options within the Arup SSR were accounting for the following:

- Sustainable development principles
- Environmental constraints
- Local knowledge/initial officer evaluation
- Feedback from the 2012 Community Choices consultation

4.8 For the remainder of this report we describe this spatial option as “South Eastern Expansion”, although this should not be confused with the term “Southern Expansion” used by Arup to describe the much larger area of land that was assessed in its SSR.

4.9 We have considered the spatial performance of a reduced South Eastern Expansion of North Weald Bassett, in line with the proposed Scenario A of the A&M Study and Peer Group’s representations for the Promoted Site.

4.10 A&M explains at Section 6.2 of the Study

that its approach to defining the area of the South Eastern Expansion area as follows:

“The southern edge has been defined by maintaining the distance of 250m, the length of Emberson Way from the High Road. Here the existing settlement is at its widest and the southern edge to development would seek to maintain but not increase this distance from the High Road.”

4.11 The map on page 118 of the A&M Study illustrates this approach, which it describes as creating “new boundaries to the settlement as defined by existing features and structure of the village” (see Figure 11). The specific approach to the proposed boundary of the South Eastern Expansion is described as:

“Set maximum distance from the High Road in line with existing furthest point and front onto the landscape”

4.12 This approach provides a strong basis for establishing the extent of the proposed South Eastern Expansion of the village to be assessed in Stage 3, Step 1.

4.13 The following table describes how Deloitte considers the Promoted Site should be assessed against the Council’s indicators for Step 1.

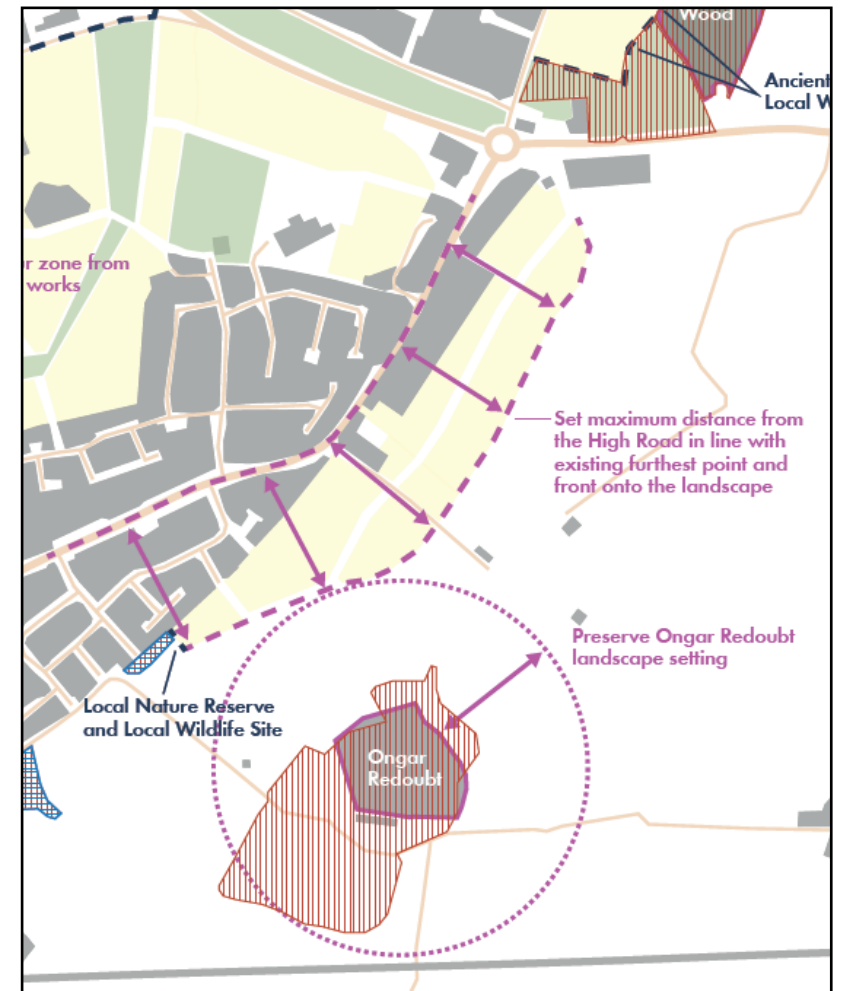


Figure 11: Extract from Allies & Morrison Masterplanning Study (Page 118) – “new boundaries to the settlement as defined by existing features and structure of the village”. The green line identifies the area of the Southern Expansion.

Factors influencing planning judgement	Deloitte assessment of the South Eastern Expansion option
Sustainable development principles set out in the NPPF	<p>South Eastern Expansion would satisfy the three dimensions of sustainable development, as summarised in paragraph 7 and 152 of the NPPF, i.e. an economic role; a social role and an environmental role:</p> <ul style="list-style-type: none"> • Economic role – the delivery of new homes will enable more people to live close to the village’s employment generators. Housing is an important element of infrastructure to be provided to sustain the economic viability and vitality of villages such as North Weald Bassett. • Social role – EFDC identifies North Weald Bassett as an important location for meeting the housing needs and social well-being of the district. Therefore, by definition the supply of new housing in the village will help to maintain a strong vibrant and healthy community. The reduced scale of expansion to the south of the village, as achieved by the Promoted Site, would also maintain the rectilinear shape of North Weald Bassett, ensuring that all residents will be well connected to the existing village facilities and services. • Environmental role – the South Eastern Expansion area, is considered to be an area of low landscape sensitivity, low ecological value, no agricultural value and low recreational value. It would create a new defensible boundary for the Green Belt along an existing ridge line, which would be strengthened by additional trees and hedgerow. The new residential area would create improved green infrastructure for the village, including enhanced footpaths, cycle paths and open space, as well as improving access to the countryside. It is relevant that Peer Group has a proven track record for delivering high quality sustainable housing and green infrastructure in North Weald Bassett, through its development of the highly successful Tempest Mead development to the south of the village, which included provision of land for a new Pocket Park known as North Weald Common and land for a local bowls club.
Environmental constraints	Our assessment of the environmental designations in Stage 2 identifies that the South Eastern Expansion would have a neutral effect on environmental designations.
Local knowledge/initial officer evaluation of sites	The South Eastern Expansion option would represent a suitable location for expanding the village to meet its housing needs. The natural contours of the area would enable the creation of a well-contained expansion of the settlement, with a new defensible boundary and development that is largely concealed from any physical or visual impact. The Promoted Site has no agricultural purpose and has low landscape and ecological value.
Feedback from the Community Choices consultation held in 2012	Responses to the Community Choices consultation for the Local Plan were reported to EFDC’s Cabinet on 10 June 2013. Given that the Community Choices consultation process related to the potential expansion of the village across the whole Ongar Park Estate comprising 190 hectares for over 6,000 homes, the results of that consultation are not relevant to our assessment of the spatial suitability of the South Eastern Expansion option.
Feedback from members	There is no published information from EFDC about feedback from members about the spatial options for expanding North Weald Bassett. The Allies & Morrison Masterplanning Study September 2014 was “noted” by members at its Cabinet meeting in October 2014, but the Study was not approved or adopted by the Council.

Deloitte commentary

- 4.14 We understand how Arup could reach the conclusion that the Southern Expansion area of 190 hectares for 6,018 homes would represent an unsustainable pattern of settlement growth beyond the existing rectilinear edge of North Weald Bassett. However, that was not the proposal that was advanced for assessment by Peer Group, nor masterplanned by Allies & Morrison.
- 4.15 The expansion of the village to the south east in accordance with the area shown in Scenario A of the A&M Study is a robust and well-balanced approach, enhancing the rectilinear pattern of the village, causing least harm to the Green Belt and utilising non-agricultural land.
- 4.16 We consider that the South Eastern Expansion would represent a logical and sustainable pattern of settlement growth, particularly as it would retain and enhance the rectilinear shape of the village by delivering an area of housing to the south east of the High Road proportionate with the rest of the village (see Figure 12).
- 4.17 Indeed, it is possible that had this area not been used for the nationally important Marconi Radio Communication Station during World War II, it could have already been developed as a natural extension of the village.

- 4.18 In contrast, the dimensions of development north of the village would be disproportionate, would cause greater harm to the Green Belt, would sterilize Best and Most Versatile ("BMV") agricultural land and would substantially alter the rectilinear shape of the village.
- 4.19 We consider that the South Eastern Expansion would represent a sustainable form of development in accordance with the three dimensions of sustainable development in the NPPF.
- 4.20 We conclude that development on the South Eastern Expansion would not be constrained by environmental designations; and that it is a suitable location for growth in planning terms.
- 4.21 In judging the spatial suitability of the South Eastern Expansion, we consider that no reliance should be placed on the outcome of the 2012 Community Choices Consultation, nor on the findings of the community exhibition on the A&M Masterplanning Study. The shape of the South Eastern Expansion is consistent with A&M's summary of how the expansion of North Weald Bassett should reflect the existing shape and character of the village:

"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 North Weald Bassett to preserve and enhance the benefits it brings to its residents." (Chapter 5 "Development Principles", Allies & Morrison Masterplanning Study, September 2014)

- 4.22 In contrast to the Local Plan Officer Working Group's findings, we strongly agree with the A&M assessment of the coherent pattern of the settlement

and the recommendation that new development should respect, protect and augment the character of North Weald Bassett. We further believe that, in line with the A&M summary advice, the South Eastern Expansion should qualify and be adopted as a "more suitable strategic option" for the expansion of the village. As such, the South Eastern Expansion should proceed for further assessment in subsequent stages of the SSM.



Figure 12: North Weald Bassett Plan showing how the Southern Expansion would maintain the Village's existing pattern of development

Output from Stage 3, Step 1: Southern Expansion qualifies as a "More Suitable Strategic Option" for growth in North Weald Bassett, so the Promoted Site proceeds to Stage 3, Step 2

Stage 3 – Step 2

More detailed consideration of sites within “more suitable spatial options”

- 4.23 Step 2 of the SSM involved further detailed assessment of sites that are located within the areas identified in Step 1 as “more suitable spatial options”.
- 4.24 Sites were considered suitable or not suitable for development based partially on their performance in the Stage 2 RAG assessment against the 31 indicators.
- 4.25 Decisions in this stage of the SSM were further informed by general member feedback, the Community Choices consultation and local knowledge/initial Planning Officer evaluation.
- 4.26 The following table describes how Deloitte considers the Promoted Site should be assessed against these indicators.

Factors influencing planning judgement Deloitte Assessment of the Promoted Site

Stage 2 RAG Assessment

Our assessment using the 31 indicators in Arup’s Stage 2 process shows that the Promoted Site (15 hectares) performs significantly better than the much larger Ongar Park Estate areas (190 hectares) that were assessed by Arup.

Paragraph 4.25 of the SSM states that “*in general...applying the RAG rating system, those sites with the most dark green (++) and least red scores (--) are likely to be the most suitable for allocation.*”

The table on the following page compares the RAG analysis for the Promoted Site with other sites in North Weald Bassett that were put through further testing by Arup. The table shows that only the Ongar Park Estate Promoted Site does not raise a red score.

The table shows the relative performance of each site in North Weald Bassett. The Peer Group Promoted Site (Sites 1C/2D) has the best aggregate score of +2 points. Only one other site achieved an aggregate positive score SR-0417 which has an area of 1.84 hectares and has a potential capacity for 55 homes. The table does not compare Arup’s RAG analysis of the Ongar Park Estate Assessed Sites (190ha), as those very large sites are not being put forward by Peer Group for development.

Applying a scoring system to the indicators shows that the Promoted Site has the best aggregate score when compared against all other sites in North Weald Bassett. This scoring is significant, as the purpose of the RAG analysis is “*to identify the relative suitability of sites for housing*” (paragraph 4.15 of the SSM). Our analysis demonstrates that the Promoted Site should be taken through further testing.

Effect	Value	Sites	1C/2D	SR-0003	SR-0036	SR-0158A	SR-0195B	SR-0076	SR-0072	SR-0417	SR-0455	SR-0512
++	2 points	Aggregate score	+ 2	-5	-5	-7	-4	-8	-6	+ 1	-4	-9
+	1 point	Effect										
0	0 points	++	1	1	1	1	1	1	1	1	1	1
-	-1 point	+	8	4	4	4	3	2	3	7	3	2
--	-2 points	0	14	16	16	15	19	18	17	16	18	16
		-	8	9	9	9	7	8	9	6	7	9
		--	0	1	1	2	1	2	1	1	1	2

Table 3: Comparison of RAG analysis for sites in North Weald Bassett

Factors influencing planning judgement	Deloitte Assessment of the Promoted Site
Local knowledge/initial officer evaluation of sites	We consider that the Promoted Site represents a suitable location for expanding the village to meet its housing needs. The natural contours of the site would enable the creation of a well-contained expansion of the settlement, with a new defensible Green Belt boundary and residential development that is largely concealed from medium and long distance views. The development would utilise non-agricultural land that has low landscape character, does not perform any significant Green Belt purposes, and has only limited environmental and ecological value.
Feedback from the Community Choices consultation held in 2012	We do not place any weight on the results of community consultation that did not include the option for the South Eastern Expansion of the village. We also do not consider that the very limited public exhibition of the Allies & Morrison Masterplanning Study can be judged to indicate a clear preference for expanding the village in any particular direction.
Feedback from members	There is no published information from EFDC about feedback from members about the suitability of individual sites for accommodating housing growth in North Weald Bassett.

Deloitte Commentary

4.27 Given that we have concluded at Step 1 of Stage 3 that the South Eastern Expansion of North Weald Bassett is a suitable option for expanding the village, we conclude that the Promoted Site should proceed to further testing.

4.28 This conclusion is further supported by our own RAG assessment of the Promoted Site, which shows that the site performs much better than the larger Ongar Park Estate sites assessed by Arup. Our analysis also shows that the Promoted Site performs as well or better than any of the sites to the north of the village.

Output from Stage 3, Step 2: the Promoted Site proceeds to Stage 3, Step 3

Stage 3 – Step 3**Sequential approach to site selection**

4.29 Section B1.5.1 of the Site Selection

Methodology describes the approach to categorising sites for further assessment, using a sequential approach.

4.30 To determine which of the sites identified as likely or possibly to be suitable for allocation should be taken forward for further assessment, each site has been given a ranking in terms of preference under three categories:

- Flood risk
- Location (encompassing greenfield/ brownfield and urban/Green Belt)
- Agriculture

4.31 Using the information set out in Section B1.5.1, we consider that the Promoted Site receives the rankings shown in the following Table 4.

4.32 The Promoted Site's ranking is superior to each of the sites to the north of the village, which would involve the loss of BMV agricultural land.

4.33 The results of Arup's assessment of the sites to the north of the village are shown in the section on North Weald Bassett in Appendix B1.5.2 of the SSM "Results of Identifying Sites for Further

Testing", under the heading "Site Rank".

All of the sites to the north of the village have at least one red rating due to their use of agricultural land.

4.34 In comparison, we give the Promoted Site two green ratings and one amber rating, such that its allocation could reduce or avoid the need for the Council to allocate sites which are on BMV agricultural land, to the north of the village.

4.35 Based on this assessment, the Promoted Sites proceed to the next stage of testing.

Category	Indicator	Ranking
Flood Risk	Flood Zone 1	1
Location (encompassing greenfield/ brownfield and urban/Green Belt)	Greenfield/Green Belt land on the edge of settlements of least value to the Green Belt if the land meets other suitable criteria for development.	3 / 4
Agriculture	No loss of agricultural land)	0

Table 4: Sequential Assessment of the Promoted Site

Output from Stage 3, Step 3: the Promoted Site proceeds to Stage 3, Step 4

Stage 3 – Step 4

Categorising sites to identify which should be subject to further testing

4.36 Section 2.7.1 of Arup's Site Selection

Report describes Step 4 of Stage 3. It explains that the total number of sites identified as potentially suitable for allocation in the district exceeds the housing need figure to be met through site allocations away from Harlow.

4.37 The report states that, to assist in identifying which sites should be subject to further testing, sites were grouped into seven categories (based on the rankings applied at Step 3). The categories are as follows:

- *"Category 1 - sites located within flood zone 1 and on previously developed land within settlements*
- *Category 2 - sites located within flood zone 1 and comprising land which is urban open space (both designated and non-designated)*
- *Category 3 - sites located within flood zone 1 and on land located on previously developed Green Belt land*
- *Category 4 - sites located within flood zone 1 and on land of least value to the Green Belt adjacent to the settlement*
- *Category 5 - sites located within flood zone 1 and on land of greater value to the Green*

Belt adjacent to the settlement

- *Category 6 - sites located within flood zone 1 and on land of most value to the Green Belt adjacent to the settlement*
- *Category 7 – contains the remaining suitable sites, which includes:*
 - *sites located within flood zone 1, which are Green Belt but not adjacent to the settlement;*
 - *sites located within flood zone 1, which are not designated Green Belt but are designated agricultural land; and*
 - *all other sites located in other flood zones (regardless of the type of land the site is located on)."*

4.38 Section 2.7.1 includes a table identifying the total number of homes promoted on potential location sites in each settlement. 16 sites are identified for north of North Weald Bassett (see Figure 16), of which:

- 1 site is in Category 3
- 4 sites are in Category 4
- 5 sites are in Category 5 and
- 6 sites are in Category 7

4.39 These sites have a total capacity of 2,470 dwellings, in comparison to the proposed distribution of homes to North

Weald Bassett of 1,580 homes (as stated in draft EFDC Local Plan Policy SP 2). Significantly, the four sites in Categories 3 and 4 would deliver only 545 homes (see Figure 13).

4.40 The SSR explains the need to identify more sites to provide a buffer for changes in capacity and feedback about the distribution of residential development across the District (including that "opportunities for growth of North Weald Bassett should be maximised"), Section 2.7.1 confirms that:

"It was therefore agreed that all sites located within categories 1 to 4 for all settlements should be taken forward for more detailed testing to allow for a distributed pattern of growth across the District. In total these sites have a capacity of 6,322, which was not considered to provide a sufficient buffer given the additional assessment that would be undertaken. Also, some settlements had none or very little land located within the first four categories and it was felt that more sites needed to be put forward for testing in these locations in order to support a distributed pattern of growth across the District and realisation of the emerging settlement visions. Therefore, all sites located in Green Belt adjacent to the settlement (whether that be land of greater value or most value to the Green Belt) within the following settlements were identified for further testing:

North Weald Bassett – to enable sites identified in to the north of the Settlement as the preferred direction of growth in the North Weald Bassett Masterplan to be subject to more detailed testing." (Arup SSR, 2016). (our emphasis)

4.41 Given that the Promoted Site for Ongar Park Estate was originally used as a Marconi Radio Communication Station and still has the concrete foundations of the radio masts, we have concluded that the site would fit partly within Category 3 "sites located within flood zone 1 and on land located on previously developed Green Belt land" and partly within Category 4 – "sites located within flood zone 1 and on land of least value to the Green Belt adjacent to the settlement".

4.42 As a result, the Promoted Site would come before the sites in Categories 5, 6 and 7 that were put forward for further testing in accordance with Section 2.7.1 of the SSR.

4.43 We therefore conclude that the Promoted Site should be subject to further testing in the remainder of Stage 3, and Stages 4 and 5 of the Site Selection Methodology.

Settlement		Total	Category 1	Category 2	Category 3	Category 4	Category 5	Category 6	Category 7
Abridge	Sites	4					3		1
	Dwellings	573					469		104
Buckhurst Hill	Sites	11	8			1	1		1
	Dwellings	470	205			60	184		21
Chigwell and Chigwell Row	Sites	33	8	5	3		5	9	3
	Dwellings	4,052	287	649	177		238	2,214	487
Chipping Ongar	Sites	15	2	1	1		2	6	3
	Dwellings	2,054	32	10	26		773	958	255
Coopersale	Sites	2		1		1			
	Dwellings	76		24		52			
Epping	Sites	26	12		2		6	6	
	Dwellings	3,129	547		193		1,464	925	
Epping Green	Sites	1					1		
	Dwellings	92					92		
Fyfield	Sites	1				1			
	Dwellings	80				80			
Harlow Extension Sites	Sites	1						1	
	Dwellings	37						37	
High Beach	Sites	1							1
	Dwellings	40							40
High Ongar	Sites	5				1	1	1	2
	Dwellings	154				10	7	41	96
Loughton/ Debden	Sites	24	15	6	1				2
	Dwellings	1,916	829	789	6				292
Lower Nazeing	Sites	15			1	4	6		4
	Dwellings	2,894			43	1,058	1,632		161
Lower Sheering	Sites	3						3	
	Dwellings	67						67	
Moreton	Sites	1							1
	Dwellings	26							26
North Weald Bassett		16			1	4	5		6
	Dwellings	2,470			12	533	962		963
Roydon	Sites	6					6		
	Dwellings	400					400		

Figure 13: Arup Site Selection Report – Table 2.6: Summary of site categorisation by settlement (September 2016)

Output for Stage 3, Step 4: the Promoted Site proceeds for more detailed assessment

Stage 3 – More Detailed Assessment of Housing Sites

Assessing the indicative capacity of the Promoted Site

4.44 The purpose of Stage 3, Step 4 is set out in paragraph 4.31 to 4.33 of the SSM, which sets out to review the indicative capacities outlined in the Strategic Land Availability Assessment and identify any factors the SSM should address ensure site capacities are accurate. This includes seven steps:

- i. Review site polygons (boundaries of the site)
- ii. Account for policy constraints which affect the developable site area
- iii. Establish a baseline density for the sites
- iv. Confirm baseline density
- v. Adjusting baseline density
- vi. Gross to net density conversion
- vii. Calculate site capacity

4.45 The capacity of the Promoted Site was assessed by Allies & Morrison as part of the North Weald Bassett Masterplanning Study for Sites 1C and 2D, as set out in Table 5 below. Figure 14 shows an illustrative layout of Promoted Site and was submitted as part of Peer Group's representations to the Regulation 18 consultation. The plan highlights how development of the Promoted Site utilising Allies & Morrison density matrix produces a site that relates well

to the North Weald Bassett, retaining its rectilinear edge. In submitting its representations for the Promoted Site, Peer Group confirmed the site's capacity for 280 dwellings, in line with the capacity assessment undertaken by Allies & Morrison.

Name	Area (ha)	Density (d/ha)	No. of Dwellings	Net to Gross Efficiency of Area	Net No. of Dwellings
1C	7.43	30	223	60%	134
2D	7.83	30	235	60%	141
Total	15.26		458		275

Table 5: Allies & Morrison capacity assessment of Sites 1C and 2D



Figure 14: Bovis Homes and Peer Group Illustrative Layout, 2016

Output for Stage 3 More Detailed Assessment: the Promoted Site proceeds to Stage 4

Stage 4 – Deliverability

Land Promoter Group / Developer Survey

4.46 Section 2.8.2 of the SSR describes the purpose of Stage 4 of the SSM, to ensure that the Preferred Sites are deliverable. Stage 4 followed three steps:

- i. A survey was sent to all site promoters, developers and/or landowners to validate information collected as part of the evidence base for site selection in the emerging local plan, including the Strategic Land Availability Assessment and other technical studies.
- ii. Availability and Achievability Assessment. A set of criteria where created under four headings – availability; achievability; cumulative achievability (in combination with traveller site allocations); and overview assessment of constraints. For each criteria under these headings, a RAG system was utilised using a scale of three scores.
- iii. Identify sites for allocation.

4.47 Results from the Land Promoter/ Developer survey are set out in Appendix B1.6 of the SSR and can be broadly grouped into the following categories:

- Contact information;
- Ownership and availability;
- Achievability;

- Land use, masterplanning and infrastructure;
- Site management;
- On-going engagement

4.48 Table 2.8 of the SSR provides an overview of the availability of the 152 sites that were subject to the availability assessment.

4.49 For North Weald Bassett, the total capacity of sites judged to available is stated in Table 2.8 as 1,523 dwellings.

4.50 This led to the process of identifying sites for allocation. Table 2.9 estimates that 1,580 homes could be delivered on 8 allocated sites in North Weald Bassett. The justification for the number of homes is stated as:

“Informed by the aspirations set out in the North Weald Bassett Masterplan, which identifies the potential for the village to accommodate between 500 and 1,600 homes.”

4.51 To inform how the Promoted Site would be taken through Stage 4, Deloitte has completed the Land Promoter/ Developer survey. The following Table 6 replicates Arup’s RAG proforma for assessing the availability of the Promoted Site.

4.52 The proforma demonstrates that the Promoted Site is deliverable for

development. The site is in single ownership and has no land ownership or abnormal cost constraints to impede delivery for housing.

Output for Stage 4: the Promoted Site is confirmed to be deliverable for development and should be allocated in the local plan

Criteria	Proposed Allocation (Site 1C & 2D)	
	Deloitte Score	Assessment
1.1 Ownership	(+)	The Promoted Site is in single ownership
1.2 Existing uses	0	Part of the Promoted Site is in use as a golf course. Peer Group can modify the course to accommodate development.
1.3 On-site restrictions	(+)	The Promoted Site is not subject to any known restrictions.
1.4 Site availability	(+)	The Promoted Site is available for development immediately.
2.1 Site marketability	(+)	The Promoted Site is owned / under option to a developer.
2.2 Site viability	(+)	No viability issues identified.
2.3 On-site physical infrastructure constraints	(+)	There are no known on-site physical constraints which would impact on deliverability.
2.4a Primary School Schools (planning area)	0	The Promoted Site is located in a school planning area with a current or forecast deficit but schools have potential to expand
2.4b Primary Schools	(+)	The Promoted Site is located less than 1km from a local primary school.
2.5b Secondary schools individual)	(-)	The Promoted Site is not located within 1km of a secondary school.
2.6 Access to open space	(+)	The Promoted Site is located within 400m of existing publicly accessible open space.
2.7 Health	0	The Promoted Site is located within 1km of the nearest GP surgery, however its current capacity status is unknown.
2.6 Impact on mineral deposits	(+)	None of the Promoted Site is located in a mineral safeguarding area.
3.1 Cumulative loss of open space in settlement	(+)	There are no identified current deficiencies in the quantum of open space within the settlement. No open space is lost as a result of the proposed allocations.
3.2 Cumulative impact on primary school (planning area)	0	The Arup SSR Stage 4 Assessment notes that proposed allocations in North Weald Bassett would lead to a shortage of current primary school places in the Schools Planning Area. There is potential to accommodate growth by either expanding schools or identifying a new site. The Promoted Site has been scored in line with Arup's Stage 4 assessment of sites in North Weald Bassett.
3.3 Cumulative impact on secondary schools (planning area)	0	The Arup SSR Stage 4 Assessment notes that proposed allocations in North Weald Bassett would lead to a shortage of current secondary school places in the Schools Planning Area. There is potential to accommodate growth by either expanding schools or identifying a new site. The Promoted Site has been scored in line with Arup's Stage 4 assessment of sites in North Weald Bassett.
3.4 Cumulative impact on green infrastructure	(+)	The Promoted Site provides the opportunity to enhance green infrastructure.
3.5 Cumulative impact on sewage treatment work capacity	(-)	The Promoted Sites impact on sewage capacity is currently unknown therefore the most conservative score has been given.
3.5 Cumulative impact on Central Line capacity	(-)	The Promoted Sites impact on sewage capacity is currently unknown therefore the most conservative score has been given.

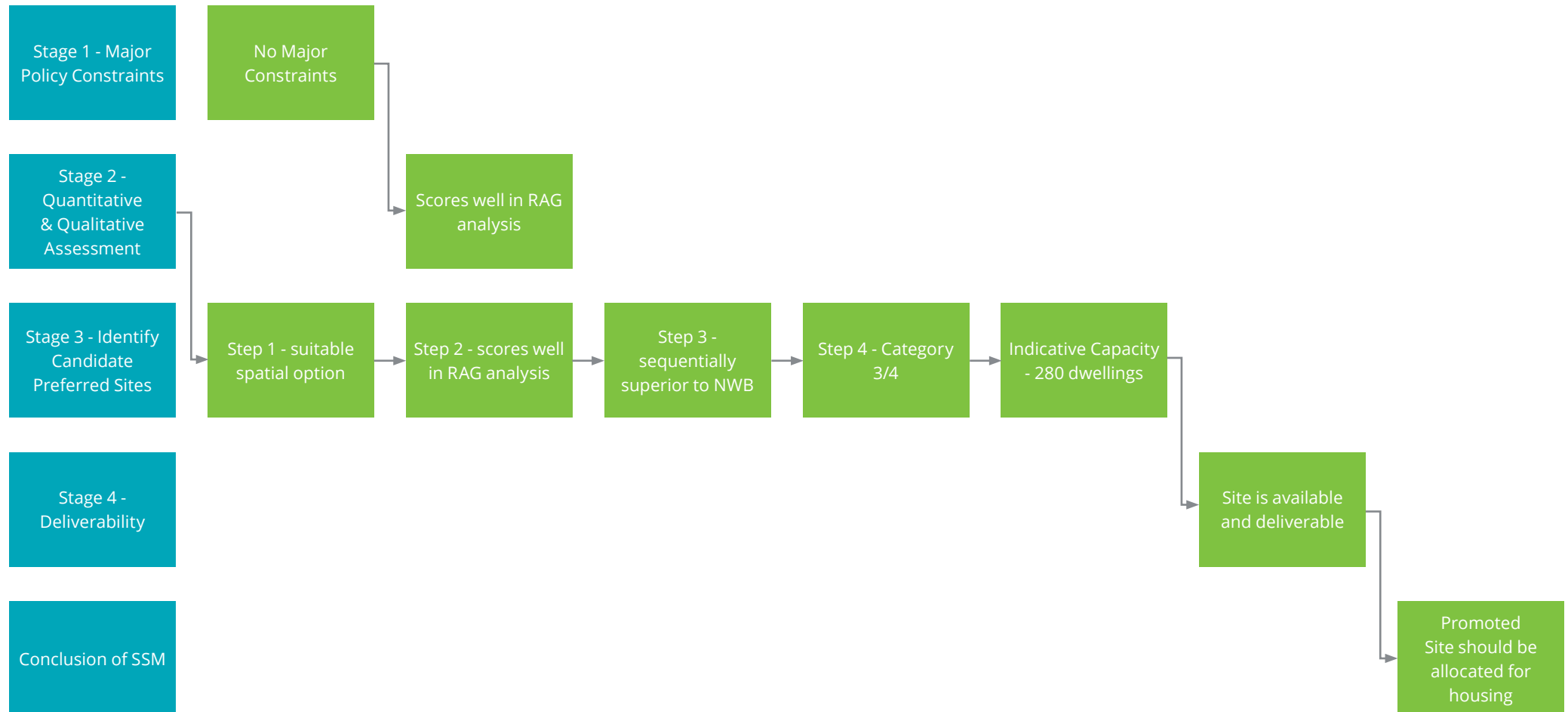
Table 6: Land / Developer Survey for the Promoted Site

5. Conclusion

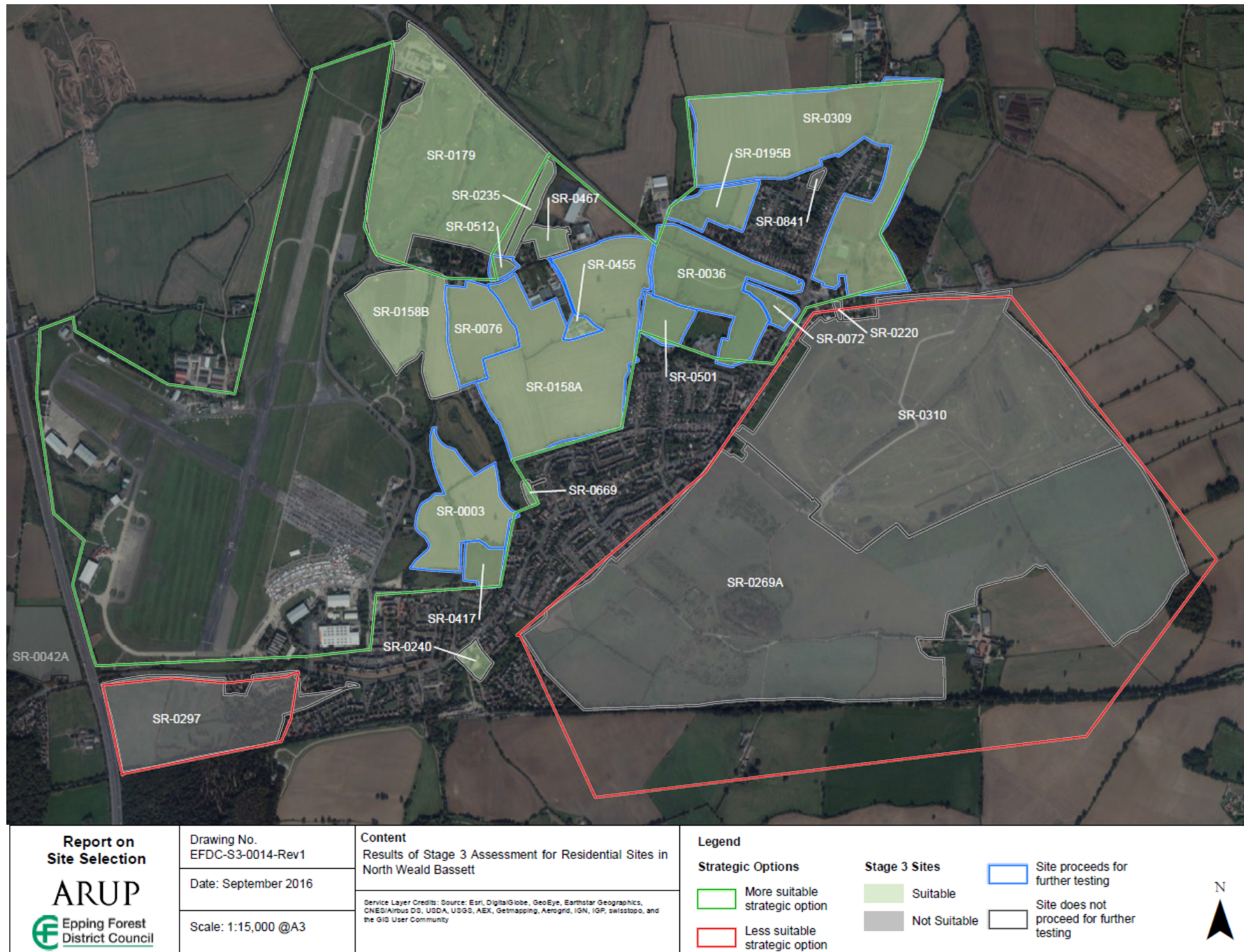
Conclusion

- 5.1 Deloitte has carried out the evaluation of the Council's site selection process for the Ongar Park Estate Promoted Site in accordance the EFDC's Site Selection Methodology. As shown on the flow chart on the following page, we have concluded that the Promoted Site passes each stage of the methodology, and is suitable and available to meet part of the District's housing needs in North Weald Bassett.
- 5.2 The Council has not undertaken an assessment of the Peer Group's Promoted Site, but, if it did, we consider that it would reach the same conclusion.
- 5.3 In reaching our conclusion, we have determined that the Promoted Site:
- Is not the subject of any major policy constraints
 - Is not subject to any environmental, landscape, physical, and accessibility constraints that preclude its development for housing
 - Is located in an area that is spatially suitable for the expansion of North Weald Bassett
 - Is a sustainable location for new housing
 - Is land that has the least value to the Green Belt, immediately adjacent to the settlement of North Weald Bassett, and can create a new defensible boundary for the Green Belt while maintaining the rectilinear shape of the village
 - Scores better in the sequential hierarchy than sites to the north of the village
 - Is suitable, available and achievable for delivering housing development
- 5.4 On this basis, we conclude that the Promoted Site should be allocated in the Submission Version of the Epping Forest Local Plan for 280 dwellings, and should be included in the Regulation 19 Consultation.

**Summary of Deloitte's assessment of the Promoted Site
using EFDC's Site Selection Methodology (SSM)**



Appendix 1 - Arup Site Selection Report - results for North Weald Bassett



Deloitte.

Real Estate

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