

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

Stakeholder ID	2619	Name	Jim	Padfield	Redacted
Method	Letter				
Date	6/2/2017				

This document has been created using information from the Council's database of responses to the Draft Local Plan Consultation 2016. Some elements of the full response such as formatting and images may not appear accurately. Should you wish to review the original response, please contact the Planning Policy team: [ldfconsult@eppingforestdc.gov.uk](mailto:ldfconsult@eppingforestdc.gov.uk)

### Letter or Email Response:

Question 2: The Council has considered a range of alternatives (which are detailed in the Draft Local Plan) and has concluded that the main settlements in the District are the most appropriate areas for new housing. The Council is proposing an approach which maximises opportunities for development around Harlow and also sites in locations within the existing settlements before considering a limited release of Green Belt Land (see draft policy SP2) Do you agree with our approach to distribution of new housing across Epping Forest District? **STRONGLY DISAGREE** Please explain your choice

1. INTRODUCTION 1.1. We have a number of observations and concerns regarding the proposed distribution of development within the District beyond the strategic allocations around Harlow.

- In order for Chipping Ongar to be self-sufficient, growth should be no less than that outlined within the draft Plan
- However, notwithstanding the level of growth needed to achieve self-sufficiency, given the need for additional dwellings to be allocated within the district (as outlined within our representation regarding policy SP2, provided in response to question 9 of the questionnaire) Chipping Ongar is a logical location for absorbing a proportion of this additional growth, given the guidance outlined at paragraphs 17 and 34 of the NPPF respectively.
- We have concerns regarding the delivery of significant growth at North Weald, and whether this would meet the guidance at paragraphs 17 and 34 of the NPPF. We consider that growth at North Weald is better directed to the towns within the district, most particularly Waltham Abbey and Chipping Ongar.

2. SELF-SUFFICIENCY OF CHIPPING ONGAR 2.1. The vision for Chipping Ongar includes that future development will support the town being self-sufficient.

2.2. According to the Site Selection Settlement Proformas contained at Appendix C of the Site Selection Report (SSR) Chipping Ongar "...serves a large rural hinterland and provides an important function within a large geographic area." In fact, its continued vitality is of key importance to this rural catchment given that the rural areas surrounding Chipping Ongar (LOSA Epping Forest 003A, B and C) all score within the top 10% in England in terms of geographical barriers (i.e. distance) to services.

2.3. In the absence of additional growth the continued vitality of Chipping Ongar's services, particularly its two primary schools, may be questionable based on current levels of surplus capacity. Essex County Council's document, 'Commissioning School Places in Essex 2016 - 2021 indicates there is a current surplus of 140 places within the Epping Forest Group 01 (Ongar) Forecast Planning Group of primary schools, which comprise Ongar and its surrounding rural area. 83 of those are within the two Ongar primary schools. Whilst other forecast groups within the district show higher numeric levels of vacancy, the Ongar group of schools shows the highest vacancy expressed as a percentage of net capacity, at 14%.

2.4. Whilst the Epping Forest District Council Town Centres Review (2016) presents a varied picture of retail health across the district, it particularly notes for Ongar the size of loss of retail floorspace to non-retail within the key frontages and that vacancy rates increased between 2009 and 2016, compared to a more positive, or at least constant, picture across the remaining centres in the district. Epping showed an increase in vacancy, however this equated to 2% of units, whereas

### Response to the Draft Local Plan Consultation 2016 (Regulation 18)

in Ongar this equates to 10%. 2.5. This chimes with the findings of the May 2010 Town Centres Study, which concluded that whilst the centre was performing reasonably well in May 2010, "...there are some vacancies and indicates in the figure the centre might be under threat." and "A central aim of the LDF should be to include policies to ensure that Chipping Ongar maintains its vitality and viability." (Paragraph 8.57). 2.6. The NPPF requires the Council to specifically consider how planning policy should "guard against unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs" (paragraph 70). Moreover, paragraph 55 outlines that, "to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities." One of the core land-use planning principles underpinning decision making and plan making (NPPF paragraph 17) is the requirement to support thriving rural communities. 2.7. It is clear that when considering Ongar's future, particular consideration must be given to the guidance outlined in the NPPF concerning the importance of 'thriving rural communities' (paragraph 17) and 'the vitality of rural communities' (paragraph 55) in order to ensure a sound Plan. 2.8. The proposal to allocate development to Chipping Ongar is therefore welcomed, given the above context. However, it is worthwhile considering whether the figure of 600 dwellings over the period to 2033 will achieve the vision for Chipping Ongar in regard to supporting the town to be self-sufficient, in the context of the above issues. 2.9. ONS Neighbourhood Statistics indicates that in terms of dwellings Chipping Ongar (comprising Chipping Ongar, Marden Ash and Greensted Ward, together with Shelley Ward) grew by 10% between 2001 and 2011, an increase in 250 dwellings. As such, extrapolating that current growth rate over the 20 years of the Plan period would equate to 500 dwellings on a 'trend' basis. 2.10. However, in the same period the population of the town aged more quickly than the district as a whole. 19% of the population were aged 65 and over in 2001, by 2011 this had increased to 21%. Across the district 17% of the population were aged 65 and over in 2001, which had increased to 19% in 2011. We note that the Site Settlement Proforma for Chipping Ongar presented at Appendix C of the Site Selection Report indicates that Ongar has a higher proportion of people aged 18 and under than the district as a whole, however our assessment of ONS statistics suggests that this proportion is 22% not 24%, which means it is the same as the average of the district. 2.11. The above context on population change, schools and town centre health suggests that the rate of development between 2001 and 2011 has not wholly fulfilled Chipping Ongar's need to be self-sufficient. Despite population growth there are concerns regarding the health of the town centre, and a population ageing at a faster rate than the remainder of the district could exacerbate the surplus of places within the town's schools. 2.12. Guidance within the NPPG (paragraph 50-001-20160519) is clear that "A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities." 2.13. As such, it is sensible that the proposed level of growth for Chipping Ongar is set above the current trend (25 dwellings per annum) as reported in the census data. However, at 600 dwellings, the proposed level of growth is only an additional 100 dwellings, or 5 dwellings per annum, above this 'trend' level. There is a clear concern therefore as to whether 600 dwellings would successfully maintain self-sufficiency. 2.14. Clearly, completions and commitments since 2011 will add to the figure of 600 dwellings. In particular, we are aware of the recent consent for circa 100 dwellings at Fyfield Business Park, which essentially falls within Chipping Ongar given it falls within Shelley Ward. This will certainly assist, increasing the additional houses above 'trend' to 10 dwellings per annum. 2.15. We would however significantly caution against any reduction in levels of housing for the town from the figure of 600 dwellings outlined, as it is clear that this could jeopardise the need for Ongar to remain self-sufficient. Failing to meet this need would not be consistent with national policy for rural areas. 3. MEETING THE NEED FOR ADDITIONAL HOUSING ALLOCATIONS 3.1. Notwithstanding the above analysis regarding the need for self-sufficiency at Ongar, our representation in regard to policy SP2, set out in response to question 9 of the questionnaire, outlines concerns regarding the ability of the Plan to meet the full objectively assessed housing need for the district, ensure a five year supply of housing, respond flexibly to rapid change and ensure that green belt boundaries endure beyond the end of the Plan period. As a result, we consider that additional housing allocations will be needed within the District. 3.2. We consider that Chipping Ongar is well placed to absorb some of this additional demand. 3.3. Ongar is a town with a secondary school, two primary schools, a range of shops, a supermarket, library numerous pubs and restaurants, a leisure centre and a new medical centre. Current and future residents of the town can access these services on foot or by cycle. A comprehensive network of bus services exists to surrounding settlements with 136 departures/arrivals per weekday. Concern is expressed regarding the reliability of these services, however development can secure financial contributions towards investment in improving public transport infrastructure, to be benefit of both future and existing residents. 3.4. The NPPF provides guidance on where development should be located. At paragraph 17 (bullet 11) it

## Response to the Draft Local Plan Consultation 2016 (Regulation 18)

outlines that Local Authorities should, “actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.”

3.5. At paragraph 34 it states that, “Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.”

3.6. The Settlement Hierarchy Technical Paper (SHTP) provides the evidence base to establish the settlement hierarchy, and this is reproduced at figure 5.1 of the draft Local Plan. The SHTP provides a list of facilities and services against which settlements are scored. Settlements with a score of higher than 21 are deemed to be towns, which have, “...a good range of services and facilities, including good public transport access.” The SHTP establishes that Epping, Chipping Ongar, Loughton and Waltham Abbey should all be considered to be ‘towns’.

3.7. Beyond the strategic development at Harlow, the draft Plan focuses significant development to North Weald, Loughton and Epping – 1,580, 1,190 and 1,640 dwellings respectively. However, Chipping Ongar and Waltham Abbey are ascribed significantly lower levels of growth, 600 and 800 dwellings respectively.

3.8. Based on the findings of the SHTP, focusing development at Loughton and Epping meets with the requirement of the NPPF to locate development close to services and facilities, to minimise the need to travel. However, it is similarly the case that given the range of facilities available at Chipping Ongar, the town constitutes a sustainable location for development, with access to a full range of services thus, minimising the need to travel. Locating additional development to Chipping Ongar would reflect guidance set out at paragraphs 17 and 34 of the NPPF.

4. GROWTH AT NORTH WEALD

4.1. We have significant concerns with regard to the quantum of development being proposed to North Weald, and consider that a substantial proportion of the development currently allocated to North Weald is better met by allocating additional suitable sites in Chipping Ongar and Waltham Abbey.

4.2. North Weald does not currently benefit from sufficient services and facilities to be considered a town within the Settlement Hierarchy Technical Paper. The North Weald Masterplanning Study sets out the delivery of key infrastructure and facilities to enable the village to increase in size by 78% during the Plan period and to ‘become sustainable’ in line with the requirements of paragraph 17 of the NPPF. However, we do not consider that the proposals will result in a sustainable community for the following reasons:-

- The settlement will not be of a sufficient size to provide a secondary school, seen as a key marker of sustainability
- The delivery and viability of the proposed Local Centre, which will be the cornerstone in establishing North Weald Bassett as a sustainable location, is questionable

4.3. We consider these issues in greater detail below, before considering the enhanced role that Chipping Ongar and Waltham Abbey could play in accommodating growth within the district.

4.4. The Town and Country Planning Association Publication, ‘Best Practice in Urban Extensions and New Settlements’ (2007) outlines it is not the case that, “any size of place can be regarded as a sustainable community. A place needs to be large enough to support a secondary school. This means the number of homes will be in the range 4,000-5,000 at least. The reasoning is that a community that cannot provide for its children through to adulthood is not sustainable, and that the quality of community life is impoverished if older children do not participate because they are sent elsewhere each day. Growing up in a sustainable community also provides a sound foundation for citizenship. Secondary school catchments can be used as the basic building block when designing the size of a new town.”

4.5. The eventual size of North Weald at the end of the local plan period will be 3,617 dwellings. Secondary schooling is not anticipated to be provided within the settlement given it would be of insufficient size as recognised in the Masterplanning study at page 64. Given the best practice outlined within the TCPA guidance, we would question whether North Weald ‘could be made sustainable’ without secondary provision within the settlement.

4.6. The North Weald Masterplanning Study anticipates the provision of new Local Centre for the expanded village, in close proximity to the existing Centre. Delivery of this enhanced Centre will evidently be a key component of making an expanded North Weald Bassett into a sustainable community.

4.7. Site SR-0417 is earmarked for 49 homes, and (whilst this is not clear from policy P6 of the draft Plan), the Site Selection Report indicates (appendix B1.6.4) that this site could deliver the ‘local centre’. We would however question the viability and deliverability of the Local Centre on this parcel given the fragmented nature of the ownership of the development area at North Weald. This fragmentation will significantly constrain the ability of the Local Authority to leverage delivery. It is widely accepted that local centres of the size which would be anticipated in North Weald are deliverable and viable within large scale housing development as a result of land value cross-subsidy from the housing element of the scheme. However, in this case the cross-subsidy will not be available.

4.8. Moreover, the usual situation of a single landowner, or formal consortium of landowners, bringing forward a comprehensively masterplanned sustainable urban extension or new settlement allows the Local Authority to control the timing of delivery of the Local Centre through the section 106 agreement for the scheme, to ensure facilities are available for residents at a reasonable point in the development process. This control over timing

## Response to the Draft Local Plan Consultation 2016 (Regulation 18)

of delivery would not be achievable where ownership is fragmented. 4.9. There is a significant risk that notwithstanding the assertion at paragraph 5.123 that, "The Council will require new retail provision to be incorporated into planning applications which support the delivery of the North Weald Bassett Masterplan" the local centre will not be delivered and will eventually be subject to an application for wholly residential development, backed with a viability appraisal establishing that the delivery of the commercial centre is not a viable proposition. 4.10. This issue is compounded by the fact that North Weald Bassett, even at the end of the Plan period, will be a settlement of a relatively small size and as such market demand for a supermarket operator could be weak, which will impact on the rents and capital values achievable. This is exacerbated by the fact that nearby competing higher order settlements (Chipping Ongar, Harlow, Epping) all have their own existing supermarket provision. 4.11. There is a further question mark over the delivery of the link between the existing and proposed commercial centres. This is seen as a key requirement within the North Weald Masterplanning Study, and is recognised not to be within the control of either the Local Authority or the developer of site SR-00417 within the Study (section 9.8). The inability to deliver effective linkages with, and prominence to, the centre of the village heightens the risk that the delivery of a local centre on site SR-0417 will not prove to be a commercially viable proposition. 4.12. Even with the provision of the infrastructure proposed within the North Weald Masterplanning Study, it is notable that North Weald would still not score sufficiently highly within the framework established in the SHTP to be considered a 'town'. 4.13. Given the above analysis we do not consider that North Weald Bassett will provide a sustainable location for significant development, and that development should instead be directed to the towns of Waltham Abbey and Chipping Ongar, which have a wider range of facilities and suitable sites to accommodate additional growth beyond that currently allocated. 4.14. Both Chipping Ongar and Waltham Abbey have a wide range of service provision and as such are logical locations for additional growth given the guidance within paragraphs 17 and 34 of the NPPF. Residents are able to access a wider range of facilities on foot or by cycling in these settlements than they would be at North Weald. 4.15. The strategic options for growth at Waltham Abbey are limited by the decisions outlined at Appendix B1.5.2 of the Site Selection Report to those close to the town centre, however it is worthwhile noting that growth to the east of the town, dismissed as unsustainable, would have a greater accessibility to services and facilities than development at North Weald. It is also noteworthy that the growth being proposed for Waltham Abbey equates to only 9% of its existing size, despite it being the second largest settlement in the district. 4.16. The Interim Sustainability Report considers at Option 2 a lower level of growth at North Weald, and consequent higher level of growth in other areas of the district (although it does not define a revised distribution). It notes (table 7.1) that lower growth at North Weald would not leverage improvements in terms of access to public transport, employment and services/facilities for the existing residents (which number 4,477) but it would offer "...opportunities to direct displaced growth towards areas that could potentially have better access to public transport, employment and services/facilities..." 4.17. Given the requirements of paragraphs 17 and 34 of the NPPF, coupled with the concerns regarding the delivery of the Local Centre outlined above and the acceptance that North Weald will not benefit from a secondary school, we consider this observation in the Interim Sustainability Report should be given significant weight, and growth at North Weald should be reduced to reflect its position in the hierarchy as a 'large village' with remaining growth directed to higher order settlements - primarily to Waltham Abbey, but also to Chipping Ongar. 5. CONCLUSION 5.1. In order for Chipping Ongar to be self-sufficient, the town must continue to grow. Evidence concerning the age profile of the town's population, capacity in the town's schools and the health of the town centre, indicates that this growth should increase from current rates. As such, 600 new dwellings should be the absolute minimum allocated to the town for the plan period. 5.2. However, notwithstanding this, Chipping Ongar is accepted within the evidence base as a sustainable location for further growth, given the findings of the SHTP. Paragraphs 17 and 34 encourage development to be located where the need to travel is minimised. Chipping Ongar, as one of the district's towns, is such a location. It is a logical settlement to accept the additional growth that the draft Plan must allocate to meet the OAHN for the district and ensure a five year supply of deliverable sites. 5.3. Finally, we consider that Chipping Ongar represents a more sustainable location for growth than North Weald Bassett and we consider the most reasonable alternative to accommodate growth in the district is to allocate a higher proportion to Chipping Ongar and Waltham Abbey, given their position in the settlement hierarchy which provides a better prospect for achieving sustainable development in the longer term. Question 6: The Draft Local Plan has identified our draft strategy for meeting the housing and employment needs up to 2033. We have identified sites for housing which are suitable and available and can be delivered in the next 17 years. Please tick the areas you wish to respond to: ?? Chipping Ongar (Draft Policy P4) REPRESENTATION CONTENTS: 1. Introduction 2. Delivering Growth at Ongar • Density • Availability • Suitability • Conclusion on Housing Supply in Ongar 3. Meeting the

## Response to the Draft Local Plan Consultation 2016 (Regulation 18)



Need for Additional Sites in Ongar • Summary of Reasons for Dismissal of SR-0090, SR-0053 and SR-0268 as Reasonable Alternatives • Development to the East of Ongar • Development to the South of Ongar • Assessment of the Site Selection Process at Ongar • Site Specific Information for SR-0090, SR-0053 and SR-0268 • Site Specific Comments Regarding Allocated Sites in Ongar 4. Conclusions Appendix 1 – Further Information Concerning Site SR-0090, Land to the East of Longfields • Appendix 1.1 Development Proposal Document Updated December 2016 • Appendix 1.2 Concept Master Plan Layout – 140 dwelling scheme • Appendix 1.3 Concept Master Plan Layout – 92 dwelling scheme • Appendix 1.4 Street Scenes (1 – 3) • Appendix 1.5 Traffic and Transport Appraisal • Appendix 1.6 Flood Risk Assessment • Appendix 1.7 Preliminary Ecological Appraisal • Appendix 1.8 Historic Environment Desk Based Assessment • Appendix 1.9 Topographic Survey Appendix 2 – Further Information Concerning Site SR-0268, Land to the South of Kettlebury Way • Appendix 2.1 – Site Specific Information • Appendix 2.2 – Highways Access Plan • Appendix 2.3 – Concept Master Plan Layout Appendix 3 – Further Information Concerning Site SR-0053, Land to the West of the Brentwood Road • Appendix 3.1 – Site Specific Information 1. INTRODUCTION 1.1. We have significant concerns in regard to the soundness of the approach proposed in the draft Plan for Chipping Ongar. 1.2. Our response to question 2 regarding the distribution of development in the district outlines that we consider Chipping Ongar should deliver no less than 600 additional dwellings in order to be self-sufficient, but notwithstanding this we believe that the town is an appropriate location to absorb more growth than that provided for within the draft plan and we raise concerns regarding the sustainability of allocating growth at the level proposed to North Weald. We consider that a strategy which focuses development on sustainable locations such as Chipping Ongar better reflects the aspirations of the NPPF. Moreover, we outline in our response to question 9, concerning policy SP2, additional sites will need to be allocated within the district, particularly those which are deliverable in the first five years of the plan period. Chipping Ongar is well placed to meet a proportion of this additional need. 1.3. However, we do not consider that the sites proposed for allocation within Chipping Ongar will ultimately deliver even 600 dwellings for the following reasons:- • The density assumptions adopted are inappropriately high for settlement edge sites and as such the number of dwellings forecast to be delivered is overestimated. • Some sites have questionable availability and should not be considered deliverable or developable within the Plan period • The suitability of some sites is questionable, in terms of the impact the development of the site would have in regard to the loss of local facilities. These sites should not be allocated. 1.4. A failure to deliver at least 600 dwellings would jeopardise the ability of the town to be self-sufficient, for the reasons set out in our response to question 2. 1.5. The first section of our representation sets out these three concerns in more detail. Following this, the second section considers whether there are other suitable, available and achievable sites within the settlement that should be allocated. Within this analysis we raise significant concerns with regard to the approach taken to assessing both the sites and strategic options at Ongar and outline the consequences this has for the legal compliance of the Plan with regard to the sustainability appraisal process and for the soundness of the Plan, given it, “...should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence” (NPPF paragraph 182). 1.6. Our representation concludes that there are three further sites in Chipping Ongar which should be allocated for development. These comprise sites SR-0090 (Land East of Longfields), SR-0268 (Land to the South of Kettlebury Way) and SR-0053 (Land to the West of the Brentwood Road). 1.7. Further information concerning these sites is attached to this representation at appendices 1 – 3. 2. DELIVERING GROWTH AT ONGAR 2.1. As outlined above, this first section of our representation establishes that the proposed strategy to deliver 600 dwellings at Ongar is inadequate for three reasons. Density 2.2. The NPPG (Paragraph: 017 Reference ID: 3-017-20140306) sets out guidance on how development potential be calculated. It outlines that, “The estimation of the development potential of each identified site should be guided by the existing or emerging plan policy including locally determined policies on density.” 2.3. Emerging policy SP4 within the draft Plan outlines that densities above 50 dph should be observed in town and large village centres, along main transport routes and close to transport nodes. Outside these areas, development should achieve densities of between 30 to 50 dph. The policy does acknowledge that lower densities may be appropriate in some areas because of the, “Prevailing character of the area and the sensitive nature of the surrounding countryside or built form”. Supporting paragraph 3.78 notes that, “the appreciation of housing density is crucial to realising the optimum potential of sites. It is not appropriate to apply density ranges set out in Draft policy SP4 mechanistically but to consider the density appropriate to the location taking account of relevant factors to optimise potential including the local context, design, transport and social infrastructure. Similarly, draft Policy DM9 states that, “Development proposals must relate positively to their locality, having regard to: i) building heights ii) form, scale and massing prevailing around the site...” 2.4. Appendix B1.5.3 of the Site Selection Report (SSR) sets indicates that the starting point for assessing capacity is 30 dph. This is then rapidly inflated firstly by between

## Response to the Draft Local Plan Consultation 2016 (Regulation 18)

115% and 150% for all sites in anything other than 'hamlets' and secondly by a further 115% to 150% for sites in settlement centres. Further increases are then applied for town and village centres and commuter hubs. 2.5. Following these initial stages, the methodology allows for a number of adjustments from this baseline density, including for reasons of 'local setting'. The Site Selection Methodology (SSM) states (page B123 of the SSR), "The local setting of sites may have higher/lower existing densities than the baseline density would suggest. A qualitative adjustment was made using percentage increase/decrease to account for existing surrounding densities or to account for a particularly sensitive local context..." 2.6. Our concern is that despite the aspirations of the SSM, no work has been undertaken to understand local setting in terms of the policy framework set by emerging policy SP4 and DM9 - namely that regard should be had to prevailing character, the sensitive nature of the surrounding countryside and local context; together with prevailing building heights, form, scale and massing. The consequence of this is that adjustments to baseline densities on the grounds of the factors outlined in policy SP4 and DM9 in the SSR are only very rarely made and site capacities are, as a result, overstated. 2.7. This can be illustrated in a number of ways. The first is to look in more detail at the approach taken by the SSR at North Weald, because North Weald is the only settlement where explicit consideration has been given to the factors outlined in policies SP4 and DM9 when determining site capacities, via the North Weald Masterplanning Study. 2.8. The Study states that (page 117) "Dwellings at settlement edge locations, adjacent to fields or other non-developed areas, have been set lower at 30dph." Only development 'close to the existing commercial centre' is considered appropriate for densities of up to 40 dph. Dwellings beyond this area that are not in settlement edge locations are suggested at 35 dph. 2.9. The capacity and deliverability assessment for the North Weald sites at appendix B1.6.4 of the SSR incorporates the findings of the Masterplanning Study when establishing site capacities. For example, applying the SSM to site SR-0195B in North Weald would have delivered a site capacity of 120 dwellings prior to any 'local setting' adjustment. However, because of the approach taken to density in the Masterplanning Study on sites at settlement edges, adjacent to fields, the capacity and deliverability assessment lists capacity at 91 dwellings, i.e. 30dph. 2.10. It seems unclear why the (evidence based) approach to settlement edge densities at North Weald is not also appropriate for other edge of settlement sites in the district which are 'adjacent to fields or other undeveloped areas'. It is certainly the case that the treatment of settlement edges of towns such as Chipping Ongar, close by to North Weald and set within the rural part of the district, should be indiscernible from the treatment of those at North Weald given the similarly "sensitive nature of the surrounding countryside" (to use the wording in emerging policy SP4). 2.11. Yet this is not the approach that has been taken for the majority of settlement edge sites in Chipping Ongar. Of the 9 sites allocated within the town, all but one are located at the settlement edge, yet only two (SR-0184 and SR-0102) have had adjustments made to reflect their setting adjacent to open countryside. 2.12. For the remaining 7, no adjustment has been made for prevailing character, the sensitive nature of the surrounding countryside and local context. Prevailing building heights, form, scale and massing have not been considered. The density is carried forward at 45 dwellings per hectare. 2.13. If all those settlement edge sites exceeding 30 dph were given a maximum density of 30 dph, to match the approach taken at North Weald, housing delivery for the town would drop from 600 to 424 dwellings, a reduction of some 187 dwellings, or 29% from that set out in draft policy P4 for Chipping Ongar. Clearly, for some areas within larger sites, densities of greater than 30 dph may well be achievable, depending on the 'scale form and massing' of adjacent development, however we strongly question whether densities of 45 dph would be appropriate across the whole of these sites given the local context and adjacent countryside. 2.14. It is also relevant to note in this regard that in relation to site SR-0390, land at Greensted Road, the stage 2 suitability assessment at appendix B1.4.2 of the SSR notes at criteria 5.2 (settlement character sensitivity) that, "Low density development is proposed which reflects the character of the area. Therefore, development is not likely to have an impact on the character of the area, subject to sensitive design close to the listed building." It is unclear why this qualitative assessment has not been carried forward into the capacity assessment for the site reported at Appendix B1.6.4 of the SSR. Within this capacity assessment development is proposed to be limited to the eastern part of the site, and the site area is reduced accordingly, but no adjustment is made to the baseline density on the allocated part of the site to reflect the qualitative comments made at stage 2. Density remains at 45 dph, which cannot be considered to be 'low'.

2.15. Overall, whilst the methodology allows for adjustments to density to be made to reflect local context, in practice very few of the assessments presented in Appendix B1.5.3 of the SSR consider the building height, form, scale and massing of the surrounding development, nor the impact of development on the surrounding countryside. Not only would this fail to recognise emerging policies SP4 and DM9, it would also lead to the risk that the Plan did not result in

## Response to the Draft Local Plan Consultation 2016 (Regulation 18)

development that meets bullet point 3 of the draft Vision for the district, which seeks development that, “respects the attributes of the different towns and villages.” Nor would it meet the draft objectives for the Plan, which include the need to, “...ensure that the design, density layout and landscaping of new development is sensitive to the character of the surrounding area...”

2.16. It is clear that a comprehensive settlement by settlement appraisal of appropriate densities and site capacities is required to avoid the Plan being found unsound as a result of not being justified by a robust evidence base.

2.17. In the absence of evidence concerning appropriate densities being provided within the technical work to accompany the draft Plan, for illustrative purposes we have also considered a sample of sites on

settlement edges adjacent to green belt in the emerging draft plans of two neighbouring authorities (East Herts and Brentwood), as set out in the following table. The analysis uses the gross to net density conversions set out at page B124 of the SSR. The average density of the eight allocations set out below is 30 dwellings per hectare.

Site Reference, Name and District Dwellings Gross Site Size (hectares) Gross to Net Factor Density Comments

SAWB2, Land North of West Road, Sawbridgeworth

East Herts District

125

4.73

0.9

29 Gross site size excludes 1.2 hectares for school expansion. Edge of settlement site overlooking green belt

SAWB3, South of West Road, Sawbridgeworth

East Herts District

175

9.82

0.8

22 Gross site size excludes land for strategic landscape buffer. Edge of settlement site overlooking green belt

SAWB4, Land North of Sawbridgeworth

East Herts District

200

7.67

0.8

33 Edge of settlement site overlooking green belt

010, Sow and Grow Nursery Pilgrims Hatch

Brentwood

37

1.2

0.9

34 Edge of settlement site overlooking green belt

022, Land at Honeypot Lane Brentwood

250

## Response to the Draft Local Plan Consultation 2016 (Regulation 18)

10.9

0.65

35 Edge of settlement site overlooking green belt

128, Ingatestone Garden Centre, Ingatestone Brentwood

60

3.25

0.9

21 Edge of settlement site overlooking green belt

032, Land East of Nags Head Lane

Brentwood

150

5.8

0.8

32 Edge of settlement site overlooking green belt

079A, Land adjacent to Ingatestone by-pass, Ingatestone Brentwood

42

1.39

0.9

34 Edge of settlement site bounded by A12 and Roman Road

2.18. We have also considered recent planning applications for edge of settlement schemes in Essex settlements in similar rural contexts to Ongar and these are set out in the table below. The average density of the five applications set out below is 28 dwellings per hectare.

Scheme Name, District and Application Reference Number

Dwellings Gross Site Size (hectares) Gross to Net Factor

Density

Comments

Land at Great Wakering Rochford 16/00668/OUT

180

8.83

0.8

25 Settlement edge site overlooking green belt

Land West of Great Wakering

Rochford 16/00731/OUT

120

5.3

0.8

28 Settlement edge site overlooking green belt

## Response to the Draft Local Plan Consultation 2016 (Regulation 18)



Land at Bakers Lane, Black Notley, Braintree 16/00605/FUL

96

3.96

0.9

27 Settlement edge site

Land West of Royston North Hertfordshire 16/00378/1

311

16.33

0.65

29 Settlement edge site. School site excluded from analysis

Land North of Conrad Road, Witham

Braintree 15/01273/OUT

150

6.4

0.8

29 Edge of settlement site

2.19. A factor that must be taken into account in any consideration of achievable densities is the impact of the Essex County Council Parking Standards, particularly on those sites suitable for predominantly two or 2.5 storey development (i.e. settlement edge sites, or those adjoining existing two storey residential development). The 2009 parking standards moved to minimum standards for residential parking, rather than the maximum standards that had previously applied. These minimum standards, coupled with larger parking bay and garage sizes, have an impact on achievable densities where storey heights are constrained. For this reason, any appraisal of achievable densities should be circumspect about using case studies involving development granted planning consent prior to 2009.

2.20. We note the proposal to review parking standards in the district and that these new standards will be based on an understanding of differing levels of car ownership, but that access to services and facilities will also be a factor (paragraph 4.84 of the draft Plan).

2.21. Whilst Essex County Council Standards might be perceived as taking a 'one size fits all' approach (draft Plan paragraph 4.89), it should be noted within the introduction to the Essex Standards that the move from maximum car parking standards at trip origin to minimum standards was based on the fact that, "...limiting parking availability at trip origins does not necessarily discourage car ownership and can push vehicle parking onto the adjacent public highway, diminishing the streetscape and potentially obstructing emergency and passenger transport vehicles."

2.22. Given the experiences, and underlying case study work, that led to the implementation of the 2009 standards, we would suggest that significantly less weight is placed on access to services, and far greater weight is placed on understanding levels of car ownership across each individual settlement (rather than categories of settlement).

Availability

2.23. The NPPF makes clear at paragraph 47 that Local Authorities must identify and update annually a supply of specific deliverable sites for the first five years of the plan, and identify a supply of specific developable sites for the period for years 6 - 10, and where possible years 11 -15.

2.24. NPPF Footnote 11 outlines that to be deliverable sites should be 'available now'. To be developable, "there should be a reasonable prospect that the site is available". The NPPG (Paragraph 020 Reference ID: 3-020-20140306) sets out what factors should be considered when assessing availability, stating that on the 'best information' there must be 'confidence' that there are no legal or ownership problems, including the operational requirements of landowners.

## Response to the Draft Local Plan Consultation 2016 (Regulation 18)

The paragraph states that, "Where potential problems have been identified, then an assessment will need to be made as to how and when they can realistically be overcome."

2.25. The Infrastructure Delivery Plan at section 9.4.1.2 outlines that, "Whilst the District suggest no plans to build any further sports centres, a number of sports facilities have been also identified for possible residential uses in future (detailed in figure 64 below). However, in all cases the existing facilities will be re-provided as part of development. In the case of Ongar Leisure Centre, this would only close in the event of a new facility being provided in North Weald Bassett."

2.26. In stating that development of Ongar Sports Centre for residential purposes is dependent on the re provision of this use in North Weald, but simultaneously outlining that 'the District suggest no plans to build any further sports centres', this immediately raises the question as to whether the Sports Centre can be considered even to be 'developable' (i.e. there is a reasonable prospect that the site is available) within the Plan period.

2.27. We note that no provision is made either within the North Weald Masterplanning Study nor the within the capacities given for the allocations listed at policy P6 (North Weald) of the draft Plan for the delivery of a new leisure centre at North Weald that would be of a scale that would be needed to replace both the Epping and Ongar facilities. The Masterplanning Study makes reference only to a small scale sports facility to serve North Weald itself.

2.28. Notwithstanding the apparent issues around availability, further concerns arise in regard to the suitability of the Ongar Leisure Centre site for residential purposes in the context of the loss of the recreational facility, these issues are considered in more detail below.

#### Suitability

2.29. The NPPG makes clear that "Assessing the suitability of sites or broad locations for development should be guided by: the development plan, emerging plan policy and national policy" (Paragraph: 019 Reference ID: 3-019-20140306).

2.30. National policy contains guidance on the provision and retention of social, recreational and cultural facilities. Paragraph 70 provides guidance regarding community facilities (which are defined as including sports venues and public houses), setting out that Local Authorities should, "plan positively for the provision and use of...community facilities...to enhance the sustainability of communities and residential environments." The paragraph continues by stating that Local Authorities must "guard against the unnecessary loss of valued facilities and services" and "ensure an integrated approach to considering the location of housing, economic uses and community facilities and services."

2.31. Paragraph 74 of the NPPF provides specific guidance on open space, sports and recreational buildings. The paragraph outlines that, "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss."

2.32. Two allocations for residential development within Chipping Ongar involve the loss of community facilities.

2.33. The first concerns site SR-0842 (Car Park at the Stag Pub, Chipping Ongar). It is clear from the Site Deliverability and Capacity Assessment at Appendix B1.6.4 of the SSR that the loss of the car park would result in the cessation of the pub use. Under 'existing uses' the assessment outlines that, "The

landowner has confirmed that the existing public house use could cease in the short term." Appendix B1.6.5 of the SSR then states in relation to this site that, "This site was identified as available within the next five years. Although it has not been marketed, it has no identified constraints or restrictions which would prevent it coming forward for development. This site should be allocated."

2.34. There is no consideration within the SSR stage 2 suitability assessment for site SR-0842 at appendix B1.4.2 as to whether the loss of the pub would amount to an 'unnecessary loss of a valued facility' within the policy set out at

## Response to the Draft Local Plan Consultation 2016 (Regulation 18)

paragraph 70 of the NPPF. Further consideration should be given to the impact of development on the ongoing operation of The Stag and whether the development of the car park is likely to result in its closure - which may be as a result of the direct aspiration of the promoter to 'cease the use in the short term' (as is clearly evident from the information contained within the SSR) or indirectly as a result of a decline in viability following the loss of its car park.

2.35. The proposed allocation of Ongar Leisure Centre raises similar issues. The Infrastructure Delivery Plan at section 9.4.1.2 outlines that, "Whilst the District suggest no plans to build any further sports centres, a number of sports facilities have been also identified for possible residential uses in future (detailed in figure 64 below). However, in all cases the existing facilities will be re-provided as part of development. In the case of Ongar Leisure Centre, this would only close in the event of a new facility being provided in North Weald Bassett."

2.36. Three facilities are then listed - Epping Sports Club, Ongar Leisure Centre and Waltham Abbey Swimming Pool. This appears to ignore Epping Sports Centre, which is also proposed to be allocated for 44 dwellings, which one could assume would similarly only be closed in the event the North Weald facility comes forward.

2.37. The closure of Epping and Ongar sports centres and their consolidation to North Weald, would not meet the requirements of paragraph 70 of the NPPF. The Settlement Hierarchy Technical Paper outlines that together Epping and Ongar comprise a total of 8,118 dwellings, rising to 10,358 dwellings taking into account the allocations in the draft Plan. North Weald Bassett will have 3,594 dwellings including the allocations in the draft Plan. Closure of both Epping and Ongar Sports Centres would result in a far higher population having to travel to access sports facilities than would result from the retention of these facilities within the Towns. Moreover, it is unclear how Ongar Academy will meet its needs for a swimming pool and sports facilities, given its proposed long term use of the leisure centre facilities for this purpose.

2.38. Overall, the closure of Ongar Leisure Centre would not 'enhance the sustainability of communities and residential environments'. Given the alternative deliverable sites within Ongar to accommodate the development (see further below) the loss of the Leisure Centre would be 'unnecessary' and would not constitute an 'integrated approach to the location of housing and community facilities'.

2.39. Nor would the proposal comply with paragraph 74 of the NPPF. Any replacement by 'equivalent or better provision' is required by paragraph 74 to be in a 'suitable location'. Given the analysis above, it seems unlikely that relocating this provision to another settlement would constitute such a location, either for the new and future residents of Epping and Ongar, or for the pupils attending an expanded Ongar Academy.

2.40. We note that the Infrastructure Delivery Plan outlines that Ongar Leisure Centre experiences low use during the day. However, the growth of the Ongar Academy (both to its current anticipated size and beyond this to accommodate demand from additional housing development), will assist in addressing the issue of low user numbers during the day, which would also be bolstered by the residents of the additional dwellings planned for the town.

2.41. The loss of both The Stag and the Leisure Centre are contrary to the 'vision for Ongar' set out in the draft Plan, which outlines that development in the town should 'support Chipping Ongar being self-sufficient and will be accompanied by the provision of local services and infrastructure'.

#### Conclusion on Housing Supply in Ongar

2.42. It is clear from the above analysis that deliverable and developable housing supply for Ongar in the absence of any further housing allocations for the town is significantly less than 600 dwellings, taking into account appropriate densities, genuinely available sites and the suitability of the sites proposed for allocation.

2.43. Our answer to question 2 outlines the importance of delivering at least 600 dwellings for the town to achieve the vision of a self-sustaining future for Chipping Ongar, as well as outlining that the town is an appropriate location for further growth in addition to this, to respond to the need for further sites

to be allocated in the district to address unmet housing needs. As such, further suitable, available and achievable sites should be allocated for development in the town. The second part of our representation, set out below, outlines three such sites.

### 3. MEETING THE NEED FOR ADDITIONAL SITES IN ONGAR

#### Response to the Draft Local Plan Consultation 2016 (Regulation 18)

3.1. This part of our representation focuses on three additional suitable, available and achievable sites that could, together or separately, contribute to meeting housing needs. These have all been put forward by the Padfield Family and are as follows:

- SR-0090 - Land to the East of Longfields, Chipping Ongar
- SR-0268 - Land to the south of Kettlebury Way, Chipping Ongar
- SR-0053 - Address is given within the stage 2 site suitability assessment at appendix B1.4.2 of the SSR as 'Land to the East of the Brentwood Road', however in fact this should read 'Land to the West of the Brentwood Road'. Please note that the family are working with the landowner of the adjoining site, SR-0457, and both sites could be delivered jointly, with access provided from the Brentwood Road.

3.2. A comprehensive suite of technical work has been undertaken to establish the deliverability of schemes of 140 and 92 dwellings on site SR-0090. Details of the development proposals are set out within appendix 1, which contains:

- Development Proposal Document (updated December 2016)
- Concept Master Plan Layout - 140 dwelling scheme
- Concept Master Plan Layout - 92 dwelling scheme
- Street Scenes (1 - 3)
- Traffic and Transport Appraisal
- Flood Risk Assessment
- Preliminary Ecological Appraisal
- Historic Environment Desk Based Assessment
- Topographic Survey

3.3. Site specific details for site SR-0268 are set out in further detail at appendix 2.1. A highways access plan for the site is attached at appendix 2.2. Site specific details for site SR-0053 are set out in further detail at appendix 3.1.

3.4. The following sites, also put forward by the Padfield Family, remain available, however we have not discussed these in detail in this representation:

- SR-0267A - Land to the south east of Chipping Ongar
- SR-0267B - Land to the south east of Chipping Ongar

Summary of Reasons for Dismissal of Sites SR-0090, SR-0268 and SR-0053 as Reasonable Alternatives

3.5. All the above sites were discounted from the site selection process at Stage 2. Within Appendix B1.5.2 of the SSR (results of stage 3 assessment for residential sites in Chipping Ongar), the justification provided for dismissing site SR-0268 is that, "the site is in a moderately sustainable location at the edge of Ongar. However, it scores poorly against several criteria, including air quality and HSE safety zones, and it was felt that these constraints could not be overcome." This justification is not based on correct information (the site is not for example in an HSE safety zone). We will return to this in greater detail later in this representation.

3.6. The justification provided for discounting sites SR-0268 and SR-0090 is that they fall within strategic options that comprise less favourable growth directions. SR-0090 is deemed to fall within an area that, "...would significantly harm the Green Belt, compromise the historic setting of Ongar and is more sensitive in landscape terms. Expansion to the east of the settlement could also harm the Scheduled Ancient Monument Ongar Castle."

3.7. Similarly, SR-0268 falls within an area deemed to, "...significantly harm the Green Belt, compromise the historic setting of Ongar, and is more sensitive in landscape terms."

3.8. This part of our representation first considers whether the process of establishing and discounting strategic options (i.e. reasonable alternatives) for Chipping Ongar has been evidence based and compliant with the requirements of the sustainability appraisal process. Subsequent to this we

## Response to the Draft Local Plan Consultation 2016 (Regulation 18)

outline where information provided within the stage 2 suitability assessment for the sites outlined above contains any factual errors.

#### The Creation and Assessment of Reasonable Alternatives at Ongar

3.9. The Site Selection Methodology (SSM) at Appendix A of the Site Selection Report (SSR) outlines at paragraph 4.24 that, "...in order to identify the most appropriate candidate Preferred Sites at Stage 3 reasonable alternatives to accommodate growth in each settlement will be assessed and a decision made on which alternative or alternatives represent the most appropriate approach. Those sites located within the more suitable settlement alternatives will then be assessed in order to identify the 'best' fit sites in that settlement."

3.10. The methodology is not clear on how the reasonable alternatives should be established. However, section 2.7.1 of the SSR outlines how reasonable alternatives were established in practice. This was undertaken during an Officer Working Group on the 13th and 14th June 2016, wherein, "Based on the locations of the candidate sites within each settlement reasonable spatial options to accommodate growth were identified."

3.11. The NPPG is clear (paragraph 018 reference id 11-018-20140306) that "The sustainability appraisal should outline the reasons the alternatives were selected..." This guidance arises from the need as set out at Article 5 of Directive 2001/42/EC to provide, "(h) an outline of the reasons for selecting the alternatives dealt with..."

3.12. For Ongar, five strategic options are identified within the Site Selection Report: intensification within the existing development boundary and then north, south, east or west beyond the existing development boundary. However, no explanation is provided as to why these alternatives were selected, contrary to the guidance outlined in the NPPG above.

3.13. The approach taken by the SSR to establishing reasonable alternatives implies all sites within each alternative exhibit common characteristics which are determinative as to their suitability (or unsuitability) for development. For example, in the case of sites to the east of the town, all sites are deemed to significantly harm the green belt, be sensitive in landscape terms and harm the setting of the town and Ongar Castle. However, as we will establish below there is no evidence that all sites

within each alternative exhibit the characteristics that are deemed to render unsuitable the strategic option in to which they fall.

3.14. Similarly, this approach to reasonable alternatives implies that sites within the favoured northern and western directions do not suffer the characteristics that result in the rejection of the eastern and southern sites. This is clearly illustrated within the justifications presented within the table at Appendix B1.5.2 of the SSR where, for example, southern expansion is outlined as being "more sensitive in landscape terms", whilst western expansion is "minimising harm to the character of the settlement and the surrounding landscape". Again, as is established below, the evidence base does not justify these conclusions.

#### Development to the East of Ongar

3.15. Turning first to consider the conclusions reached in regard to development to the east of the town. Appendix B1.5.2 states that, "This option would significantly harm the Green Belt, compromise the historic setting of Ongar and is more sensitive in landscape terms." The following analysis takes each of these assertions in turn.

#### Green Belt

3.16. The Stage 2 Green Belt Review (2016) comprises the evidence base for judging relative harm to the Green Belt. Table 4.1 of the Review provides a summary of the relative harm development would cause within the parcels around each settlement. Land to the east of Ongar is situated within parcel

023.2 and the Review deems that release of this parcel would cause 'very high' harm.

3.17. We note at footnote 5 on page A21 of the SSR that the green belt assessment using three purposes (check unrestricted sprawl of large built up areas, prevent neighbouring towns from merging and preserving the setting and special character of historic towns) has been used for site selection.

3.18. It is clear from reading the Stage 2 Green Belt Review that there are errors within it in regard to parcel

#### Response to the Draft Local Plan Consultation 2016 (Regulation 18)



023.2 to the east of the town, which throw significant doubt on the conclusion that site SR-0090 as promoted by the Padfield Family has been correctly assessed in Green Belt terms.

3.19. The Stage 1 Assessment considered land to the East of Ongar as DSR023, however the Stage 2 Assessment breaks this down into a number of smaller parcels. The land considered under the stage 2 review as being the land to the east of Ongar comprises the western part of parcel DSR023 and is given the label number 023.2. This is shown on the plans within the Stage 2 review as stretching from the A414 in the north, to the Stondon Road in the south. However, within the Technical Annex to the Stage 2 Review the 'Features Used to Define Parcel' are set out for parcel 023.2 as being, "River Roding forms relatively strong boundaries to the south and east; A414 forms strong boundary to the north". We assume reference to the River Roding to the South is in fact to the Cripsey Brook/River Roding, which meet in this area.

3.20. However, the plans within the Stage 2 Green Belt Review clearly show parcel 023.2 continuing south over the River to the Stondon Road. It would appear that this is a mapping error, rather than an error in the text under 'Features used to define parcel' because the features used are consistent with the Review methodology outlined at table 3.1, which states that watercourses are deemed to be features that form strong boundaries. It would make sense that the river forms the southern extent of a parcel stretching southwards from the A414.

3.21. Further evidence that this is a mapping error is found in the detail of the Stage 2 Assessment for parcel 023.2 in the Review's Technical Annex. Mention is made of St Peters Way and the Three Forests Way running through parcel 023.2, but no mention is made of the footpaths to the south of the river. This suggests that the assessment was only carried out in regard to the land to the north of the river. Similarly, within the stage 2 assessment of 023.2 against purpose 3 a detailed description is included of the land uses within the parcel, with mention of the arable land, allotments, playground and recreation ground and individual detached properties. No mention is made of grazing land, which comprises the current use of the land to the south of the river/north of the Stondon Road (i.e. parcel SR-0090).

3.22. This would explain why the parcel 023.2 is judged to contribute strongly to the fourth green belt purpose, that of preserving the setting and special character of historic towns, without qualification, even though it is obvious that the part of the parcel to the south of the Cripsey Brook/River Roding, which is divided from the historic core of the town by the river and associated vegetation, situated adjacent to the 1950s development at Longfields and which does not contribute to maintaining the linear nature of the historic core of the town, could not logically be argued to contribute 'strongly' in this regard, and would be better argued to make a 'moderate' or at most 'relatively strong' contribution.

3.23. We would highlight that the scheme of 92 dwellings on the reduced area of SR-0090 sits tight into the 1950s development at Longfields to the west, well screened from the area surrounding the Castle to the north by intervening woodland to the immediate north of the Cripsey Brook, avoids any perception of harm to the Castle to the north.

3.24. A mapping error would also explain why there is no parcel 023.1 listed within the Green Belt assessment - the numbering for the sub-parcels within DSR023 begins at 023.2.

3.25. Overall parcel 023.2 is predicted to result in 'very high' harm to the green belt if it were released for development, based on the contribution to the three green belt purposes. However, given the evident errors in the stage 2 green belt review and the revised analysis above, a proper appraisal of the area to the south of the river should reveal that its release would cause at most a 'high' level of harm, and more realistically a 'moderate' level of harm.

3.26. A 'high' level of harm would equate to the same level of harm as 6 out of the 7 sites proposed for release from the green belt around Chipping Ongar. At a 'moderate' level of harm it would perform better than 6 of the sites proposed for release.

3.27. It is clear that the justification presented at Appendix B1.5.2 of the SSR that all sites to the east of the town result in 'significant harm' to the green belt (with the consequent clear implication that sites to the north and west do not) is not supported by the evidence.

#### Historic Setting

3.28. The second assertion contained in Appendix B1.5.2 of the SSR for the rejection of land to the east of the town is that it would 'compromise the historic setting of Ongar'. Appendix B1.4.2 of the SSR sets out the outcomes of the stage 2 suitability assessment. Included within this stage 2 analysis is criterion 1.8a 'Impact on heritage assets'. Site SR-0090 is outlined as having a neutral impact on heritage assets, with the commentary that, "proposed site located within the

#### Response to the Draft Local Plan Consultation 2016 (Regulation 18)

setting of a heritage asset and effects can be mitigated.” Given that SR-0090 is part of the reasonable alternative that the SSR deems ‘east’, and given that the SSR considers that development of the parcel would have a neutral impact on heritage assets, the justification for rejecting all development to the ‘east’ of Ongar including that to the south of the River Roding/Cripsey Brook on heritage grounds is clearly not justified by the evidence base provided in the SSR itself. Moreover, we have established above the reasons why the land to the south of the Cripsey Brook/River Roding does not make a strong contribution to the setting of the historic part of Ongar in green belt terms.

3.29. We note that other sites within the favoured western strategic option score the same or more negatively within the stage 2 suitability assessment phase in relation to heritage assets than site SR- 0090. For example, site SR-0067i is indicated to score amber negative in relation to heritage assets given its location adjacent to a listed building. Once again, the evidence base does not support the conclusion that the situation of a site to the north, south, east or west is determinative of its impact on heritage assets.

### Landscape

3.30. Finally, appendix B1.5.2 of the SSR asserts that development to the east is ‘more sensitive in landscape terms’. The stage 2 suitability assessment at appendix B1.4.2 includes at criterion 5.1 ‘landscape sensitivity’. Site SR-0090 is outlined as falling within an area of high landscape sensitivity, which is vulnerable to change and unable to absorb development without significant character change.

3.31. Firstly, we would like to highlight that allocated sites SR-0067i, SR-0120, SR-0184, SR-0185, SR-0186 and SR0390 all score identically to SR-0090 in terms of landscape sensitivity within the stage 2 suitability analysis presented at Appendix B1.4.2 of the SSR. For this reason, rejecting all development to the ‘east’ of Ongar including that to the south of the River Roding/Cripsey Brook (i.e. SR-0090) on landscape grounds, and implying that sites to the north and west ‘minimise harm’ to the surrounding landscape is clearly not justified by the evidence base presented in the SSR.

3.32. Notwithstanding this, the conclusions presented in the SSR concerning landscape sensitivity are stated within Appendix B1.4.1 of the SSR as being based on the Chris Blandford Associates 2010 Settlement Edge Landscape Sensitivity Study (SELSS). Within this Study, SR-0090 forms one very small part of landscape setting area 3, which covers the entirety of the eastern flank of Ongar. Setting Area 3 is assessed as having moderate overall landscape character sensitivity but is considered to have both higher indivisibility and high visual prominence. There is very little doubt that this conclusion arises as a result of the very significant extent of setting area 3, which extends over two miles when measured north to south, encompassing the entirety of the Roding River Valley as it passes east of Ongar. It includes a number of sites deemed to fall within the strategic option of ‘north’ as set out within the Site Selection report (including allocated sites SR-0184, 0185 and 0186).

3.33. It seems clear that any reliance on the SELSS in considering development at the site scale would not be robust. In fact, the SELSS itself clearly states at paragraph 8.6.1 that, “Further assessment work would, however, be needed to examine site-specific landscape and visual sensitivities.”

3.34. It is certainly the case that in considering SR-0090 in isolation, particularly that part between Longfields to the west and the dense hedge to the east which extends from the Stondon Road northwards to the Cripsey Brook/River Roding, there would be little site specific sensitivity concerns. In fact, development in the area of Longfields would offer opportunities to establish a more sympathetic transition between town and countryside. The 1950s housing which comprises Longfields is not sheltered by extensive vegetation and the SELSS notes (within figure 12.1) that there is a hard urban edge in this vicinity. The following photograph shows how the exposed urban edge in this location is experienced by walkers using the footpath that extends eastwards from Ongar towards Stondon Massey.

3.35. The proposals we have put forward for 140 dwellings, as outlined on the attached concept master plan for the site, include the use of the already dense eastern hedge as the boundary for the development, which is proposed to be augmented and reinforced by establishing a further hedge directly beyond it to form a ‘green lane’. This will reduce the visibility from the key short distance views from Mill Lane in the east and along the footpaths which run towards the town from this point. We have put forward with this representation a second, smaller, alternative scheme in addition, and this this would similarly deliver a ‘green lane’ to the eastern boundary of the scheme to deliver the same landscape benefits.

## Response to the Draft Local Plan Consultation 2016 (Regulation 18)

3.36. Once again, drawing a broad brush conclusion that all sites to the east of the town exhibit greater sensitivity than those to the north and west of the town is not justified by the evidence base. As such the conclusions reached in the SSR for rejecting all development to the east of the town are not justified.

#### Development to the South of Ongar

3.37. Turning to consider the land to the south of the town, into which site SR-0268 falls. Appendix B1.5.2 of the SSR states that development to the south of the town has been disregarded because, "This option would significantly harm the Green Belt, compromise the historic setting of Ongar, and is more sensitive in Landscape terms." Once again, we take each of these assertions in turn below.

#### Green Belt

3.38. The boundaries of the land determined to be 'south' within the Appendix B1.5.2 of the SSR mirror the boundaries of parcel 024.1 within the stage 2 Green Belt review. This parcel is deemed to contribute strongly to safeguarding the countryside from encroachment and moderately to preserving the special character of historic towns, giving the parcel an overall rating of 'very high' within table 4.1 of the Review. However, the assessment of the parcel against the three green belt purposes used for the purposes of site selection within the SSR reduces the overall rating of 024.1 to 'moderate'. This is recognised within the Stage 2 Suitability Assessments outlined at appendix B1.4.2 of the SSR, which states that, "the level of harm caused by release of the land for development would be very low, low or medium." This directly contradicts the assertion in Appendix B1.5.2 of the SSR that land to the south of the town will 'significantly harm' the Green Belt.

3.39. In fact, the parcel performs better in green belt terms than 6 out of 7 of the sites proposed for removal from the green belt around the town.

3.40. It is notable that in green belt terms the Padfield Family's site SR-0053 exhibits a high level of containment from the balance of the parcel 024.1, with existing trees and hedges forming strong green belt boundaries on all sides. The site also lies adjacent to site SR-0457, which has similar characteristics. The Padfield Family are working with the owners of site SR-0457 and both sites could be delivered jointly, with access provided from the Brentwood Road. It is difficult to conclude, contrary to the assertion in appendix B1.5.2 of the SSR, that the release of these parcels would significantly harm to the Green Belt.

#### Landscape

3.41. In terms of landscape sensitivity, the conclusion reached that all development to the south would be 'more sensitive' in landscape terms directly contradicts the findings of the SELSS. The land to the west of the A128 Brentwood Road, into which both sites SR-0053 and SR-0457 are situated, is within Landscape Setting Area 5 within the SELSS. This area is found (paragraph 12.5.2) to have low overall sensitivity to change. This is recognised within the site suitability assessment for sites SR-0053 and SR-0457, reported at appendix B1.4.2 of the SSR.

3.42. These sites are less sensitive in landscape terms than the majority of sites allocated for development in Chipping Ongar. The conclusions of the SSR that development to the south of the town is 'more sensitive' in landscape terms is simply not justified by the evidence base.

#### Historic Setting

3.43. In terms of impact on historic setting, the Green Belt review finds that parcel 024.1 makes only a moderate contribution to preserving the setting and special character of historic towns - a lesser contribution than for example site 016.1, to the north of the settlement which contains a number of allocated sites. Equally, the findings of the site suitability assessment reported at appendix B1.4.2 score SR-0053 and SR-0457 as having a light green positive (SR-0053) impact or neutral impact (SR-0457) on heritage assets (criterion 1.8a) and report a neutral impact on settlement character sensitivity (criterion 5.2). There seems no justification for categorising all sites falling within the 'south' strategic option as having an adverse impact on the historic setting of the town.

#### Assessment of Site Selection Process at Ongar

3.44. The above analysis illustrates clear deficiencies with the application of the SSM in practice. Whilst the SSM sets out the apparently logical process of selecting reasonable alternatives and then choosing the most appropriate,

### Response to the Draft Local Plan Consultation 2016 (Regulation 18)

mirroring the guidance on sustainability appraisal set out in the NPPG, in practice the SSR shows that the process has failed to produce a robust, evidence based outcome. This failure predominantly arises from the illogical selection of reasonable alternatives in the initial phase. If reasons had been given within the SSR as to why reasonable alternatives were selected (in accordance with the guidance at paragraph 018 of the NPPG reference ID 11-018- 20140306) this issue may have become obvious early in the process.

3.45. The danger of justifying the selection of preferred options without reference to the evidence available, or with reference to flawed or no evidence, is amply illustrated by the recently reported case of Stonegate Homes Ltd and Another vs Horsham District Council (2016) EWHC 2512 (Admin).

3.46. This case involved the Henfield Neighbourhood Plan and the rejection by it of development to the west of the town as a reasonable alternative for future growth owing to the conclusion that it would place unsustainable pressure on the local road system. The judgement found (paragraph 73) that there was, "...no evidence to support the view expressed for the rejection of option C [land to the west of the village]" and that (paragraph 74), "The problem here is that the absolute nature of the rejection of option C is unsupported by anything other than guesswork... the reason for rejecting option C as set out in paragraph 4.19 of the HNP is flawed, based as it is upon an inadequate, if that, evidence base. The requirement under the Directive, that the alternatives are to be assessed in a comparable manner and on an accurate basis was simply not met." The judgement continues at paragraph 74, "The obligation under the SEA Directive is to ensure that the consideration of reasonable alternatives is based upon an accurate picture of what the reasonable alternatives are. That was not done here. Not only was the conclusion wrong but, in the circumstances, it was irrational, given the absence of an evidence base." As a result (paragraph 78), "...in my judgement, the assessment of reasonable alternatives within the SEA process was flawed and the making of the HNP was incompatible with the EU obligations."

3.47. With regard to the SSR, there is of course an evidence base, so the situation could be superficially distinguished from the situation in Stonegate on that basis. However, it is clear that in the case of the SSR this evidence base has been largely ignored in both framing the reasonable alternatives and choosing the most preferred. As a consequence the obligation to ensure that the consideration of reasonable alternatives is based upon an accurate picture of what the reasonable alternatives are, is not met, and the conclusions reached are as irrational as those regarding option C within the Henfield Neighbourhood Plan, given the evidence base presented. So it seems clear that in regard to Chipping Ongar, the requirements of the SEA process have not been met.

3.48. We consider a far more robust set of reasonable alternatives would be established through selecting sites for development based on their relative suitability for development, without any prior arbitrary filtering based only on the position of sites around the settlement. Whilst we appreciate that a

significant number of sites require assessment, we do not consider that this warrants taking an unjustified and therefore unsound approach to site selection.

3.49. Within this process we recognise that site selection will involve selecting sites that best fit key objectives for Ongar. These objectives need to be established clearly and transparently. They may include prioritising suitable development locations close to the secondary school and health centre, or avoiding high quality landscapes, or protecting the setting of Ongar Castle. However, sites must be considered individually, rather than collectively in groups, against any objectives established (unless they can be proven to exhibit similar characteristics, without effecting the robustness of the analysis). Each site will have a unique profile of attributes and constraints. This will enable an accurate picture to be given of what the reasonable alternatives are for Chipping Ongar. Moreover, it is vital that the qualitative process of selecting objectives, assessing sites against them and weighting the relative importance of each objective to reach a conclusion must be explicitly presented and described.

3.50. Guidance on incorporating qualitative judgements is provided in Stonegate. Paragraph 73 of the judgement refers to guidance set out in the Practical Guide to the Strategic Environmental Assessment Directive (ODPM), which, "...advises that predictions do not have to be expressed in quantitative terms as quantification is not always practicable and qualitative predictions can be equally valid and appropriate. It goes on to say in paragraph 5.B.11: "However, quantitative does not mean 'guessed'. Predictions need to be supported by evidence, such as references to any research, discussion or consultation which helped those carrying out the SEA to reach their conclusions."

## Response to the Draft Local Plan Consultation 2016 (Regulation 18)

3.51. Page 14 of the SSR outlines in regard to selecting the preferred option for each settlement, "Each option was assessed using planning judgement, having regard to a range of factors including sustainable development principles set out in the NPPF, environmental constraints, local knowledge/initial office evaluation of sites, feedback from the Community Choices consultation held in 2012 which sought views on the suitability of broad locations for growth in and around settlements and previous feedback from Members." This section continues further by stating, "For each spatial option identified, a judgement was made about whether the option represented a more suitable or less suitable location for growth."

3.52. It is very clear that this stage of the site selection process needs to be made far more transparent and supported by clear references back to the evidence base. We are confident that a robust evidence based approach to site selection will illustrate that the sites put forward by the Padfield Family, in particular sites SR-0090, SR-0053 and SR-0268, are suitable for allocation to meet the need for additional sites to be allocated at Chipping Ongar during the plan period.

Site Specific Information for SR-0090, SR-0053 and SR-0268

3.53. This section of our representation outlines further information in regard to the above sites and highlights errors within the stage 2 suitability assessments for the sites as outlined at appendix B1.4.2 of SSR.

Site SR-0090 Land to the East of Longfields

3.54. In regard to site SR-0090, as outlined above a comprehensive suite of technical work has been undertaken to establish the deliverability of two alternative schemes of 140 dwellings and 92 dwellings. This work is attached to this representation at appendix 1.

3.55. These documents (aside from the illustrative master plan for 92 dwellings) were first submitted to Epping Forest on the ...Redacted... Receipt was acknowledged by ...Redacted... on the ...Redacted...

3.56. The Detailed Methodology for Stage 2 Assessment set out at appendix B1.4.1 of the Site Selection Report (page B84) states that, "where available, the assessments took into account any additional information held by the Council on individual sites, submitted through the Call for Sites process."

3.57. Unfortunately it would appear that the information submitted to ...Redacted... in June 2015 was not taken into account when assessing SR-0090. The following inaccuracies arise within the stage 2 suitability assessment of the site provided at appendix B1.4.2:-

- The proposed boundaries as set out on the attached master plan for 140 dwellings do not match those assumed within the assessment, although notwithstanding this, we would also like to highlight that any part of the site would be available for a scheme of reduced size accessed direct from Longfields (and this approach is outlined as being acceptable at paragraphs 4.15 - 4.18 of the Traffic and Transport Appraisal attached with this representation). We attach a further master plan for 92 dwellings which sets out this approach.
- In regard to accessibility criteria 3.4 (distance to local amenities), no account is taken of the proposal to provide an upgraded footpath and cycle path from the development, across the river, to connect to the High Street via Bushey Lea. This brings the centre of the development within 1000 metres of the town centre.
- Criteria 3.6 - distance to secondary school. No account is taken of Ongar Academy, which is between 1,000 and 4,000m from the site.

Site SR-0268, Land to the South of Kettlebury Way

3.58. In regard to site SR-0268, further information concerning the Padfield Family's vision for the site is attached at appendix 2, together with an access plan illustrating how the site is proposed to be accessed.

3.59. However, the assessment process for the site as set out in the SSR appears to be flawed and incorrect. The site is rejected for further consideration at stage 3 (despite being within the favoured 'western' strategic option) because, "This site is in moderately sustainable location at the edge of Ongar. However, it scores poorly against several criteria, including air quality and HSE safety zones, and it was felt that these constraints could not be overcome."

## Response to the Draft Local Plan Consultation 2016 (Regulation 18)



3.60. In regard to HSE safety zones, these refer to the presence of pipeline infrastructure. The site is not in such a safety zone, as is amply confirmed within the Site Suitability Assessment at appendix B1.4.2 of the SSR which concludes in regard to criterion 6.2a that, "gas or oil pipelines do not propose any constraint to this site." An error has clearly been made.

3.61. In terms of air quality the Site Suitability Assessment at appendix B1.4.2 states in relation to this criterion that, "Site lies within an area which has been identified as being at risk of poor air quality but it is likely that the risk can be mitigated or reduced." And that, "parts of the site are close to the A128 and therefore mitigation measures are likely to be required." Notwithstanding the site takes access from the A113, with the A128 some distance away from the site to the east of the town, this commentary on air quality is identical to that for all sites located near A roads in the town, including the heavily trafficked A414. Given that a significant proportion of development has been allocated on sites directly adjoining the A414, and the Site Suitability Assessment outlines that any impact on development as a result of poor air quality can be mitigated, it seems a further error has been made in dismissing site SR-0268 on this basis. Moreover, notwithstanding this, the developable part of the

site is situated some distance from the A113, and in reality it is therefore very unlikely to be affected by air quality issues.

3.62. Under criterion 6.4, access to site, the Site Suitability Assessment reports that, "Potential for access to the site to be created through third party land and agreement in place, or existing access would require upgrade." and, "access is down pathway/track shared with Hotel/Manor House."

3.63. Access to this site would not be taken through third party land. There is an existing access to the north of Marden Ash house that is in the ownership and control of the Landowner. The attached access plan (appendix 2.1) provided by transport consultants Bancroft Consulting shows a suitable access can be established for up to 25 dwellings utilising this route. Further pedestrian and cycle access can be provided via the southern spur from the Stanford Rivers Road, also within the ownership and full control of the landowner.

3.64. In addition to the above, it is relevant to note that the site comprises a vacant and derelict former farmyard, but includes at the east of the site a range of traditional buildings originally established alongside the construction of Marden Ash House. This range would be included in any scheme, retained and converted to residential use.

3.65. A BS 5837:2012 Tree Survey, undertaken alongside the highways consultancy advice outlined above, has confirmed the site could deliver 25 dwellings. 40% of the dwellings would be affordable. Notwithstanding that this low density approach would be appropriate in a highways and arboricultural context, it would also reflect the situation of the site adjacent to Kettlebury Way and the listed house and stable block of Marden Ash House. A lower density scheme would also facilitate the retention, restoration and sympathetic conversion in an appropriate setting of the traditional farm buildings.

3.66. The 2010 SELSS does not include Marden Ash Farmyard within the landscape setting for Ongar - it sits beyond the inner boundary of landscape setting area 5, implying that the area has been judged in landscape terms to form part of the urban envelope of the town.

3.67. However, we also note that at figure 12.1 of the SELSS Marden Ash Farmyard is outlined as a 'major woodland block', although it is not designated as a Sensitive Woodland Area within figure 12.4. It is

however clear from inspecting the site that Marden Ash Farmyard does not form a 'major woodland block', although given the screening afforded by the boundary vegetation and the lack of public rights of way across the site we can understand why the consultants may have believed it was significantly treed. The photographs attached within our proposal document at appendix 2 illustrates the open nature of the interior of the site. This shows that beyond the vegetation which screens the site from the open farmland to the south, the site is open and capable of absorbing development.

3.68. The yard presents an opportunity to achieve sensitive infilling adjacent to the existing development boundary of the town for a scheme of 25 houses which would incorporate the retention and conversion of the traditional buildings on a site well screened from the open Green Belt beyond.

Site SR-0053 Land to the West of the Brentwood Road

## Response to the Draft Local Plan Consultation 2016 (Regulation 18)

3.69. Further information concerning the Padfield Family's vision for the site is attached at appendix 3. We have no amendments to the criteria assessment for the site set out at Appendix B1.4.2, aside from the presence of a secondary school within the town, which appears to be an omission made in regard to all sites in the town.

3.70. We wish to reiterate that the Padfield Family and the owners of adjacent site SR-0457 have agreed to work cooperatively to deliver both sites as a single scheme if this were considered desirable.

3.71. In regard to the 'Site proforma for developer meetings for sites not proposed for allocation, summary of assessment process and current status in relation to Epping Forest District Draft Local Plan, November 2016, we note the contact details are out of date ... Redacted...

#### Site Specific Comments Regarding Allocated Sites in Ongar

3.72. This section provides further commentary on sites proposed for allocation in Ongar and also those which were not allocated but proceeded through stages 3, only being discounted at stage 4 of the SSR. In particular, we are concerned that the Stage 2 Green Belt review does not adequately consider the role of sites in regard to Green Belt purposes.

#### Noise

3.73. A number of sites are proposed which are situated adjacent to the A414. We note that a consideration of noise impacts is not included within the SSR, with this not being a criterion against which sites are considered within appendix B1.4.2 site suitability assessments. We would suggest that this is included within any consideration of site suitability as it could have significant impacts on the capacity of sites along the A414 to absorb development.

#### Assessment of Sites Against Green Belt Purposes

3.74. We have concerns that the Stage 2 Green Belt Review has not adequately considered the extent to which the Green Belt around the town contains sprawl. The first green belt purpose is to 'check the unrestricted sprawl of large built up areas'. The Stage 2 Green Belt Review restricts this to a consideration of sprawl from Harlow, Cheshunt and Hoddesdon. However, there is no definition within the NPPF or NPPG regarding the definition of a 'large built up area'. We consider that a wider definition of 'large built up areas' should be considered, including the role of green belt adjacent to all towns in the district in preventing the sprawl of that town. This is the approach taken by North Herts in their 'North Hertfordshire Green Belt Review' (2016).

3.75. In making this assessment it is essential to acknowledge that the dictionary definition of 'sprawl' is 'spread out over a large area in an untidy or irregular way'. It is therefore also important to consider whether the development proposed would extend as an isolated 'finger' of development (and thus have a high potential to create sprawl), or whether the development successfully 'rounds off' an existing residential area, resulting in a regularly shaped settlement which does not straggle outwards sporadically (i.e. sprawl).

3.76. In this connection we raise particular concern regarding the eastern half of SR-0865 and SR-0184. Both sites result in a finger of development extending eastwards along the A414 and will greatly increase the perception that Ongar is sprawling along the A414, towards High Ongar.

3.77. Moreover, we have concerns that the Stage 2 Green Belt Review has not adequately considered the role the green belt to the north east of the town plays in maintaining the separate identity of Chipping Ongar and High Ongar. The second green belt purpose, of preventing towns from merging, is only considered within the Review in regard to the larger towns and villages. High Ongar does not feature within this list and therefore no weight is placed on the role land plays in maintaining the separation between these settlements. We do not consider it appropriate to adopt such a narrow view in regard

to the role of the green belt in preventing the merging of settlements, and wider consideration should be given to the importance of the green belt in this regard.

3.78. We have a particular concern as to the role that the eastern half of SR-0186 and SR-0184 play in maintaining the separation between Chipping Ongar and High Ongar, and consider that this should be given weight in the site selection process.

#### Landscape

### Response to the Draft Local Plan Consultation 2016 (Regulation 18)

3.79. We have outlined above the shortcomings of relying on the findings of the SELSS when assessing the landscape sensitivity of smaller sites. We consider that landscape sensitivity should be considered on a site by site basis, particularly as the SELSS itself clearly states at paragraph 8.6.1 that, "Further assessment work would, however, be needed to examine site-specific landscape and visual sensitivities."

3.80. We have particular concern with regard to site SR-0112, which whilst not allocated did proceed through to stage 3 of the site selection process. This site is prominent on the approach to Ongar from the south along the A113. Development on this site would be highly visible from this approach, given the topography. The need to take access from the A113 would further increase this prominence. The current alignment of the A113 in this location is such that any access would require the removal of significant areas of boundary planting which currently screen the site to the west, either to provide a roundabout or adequate sight lines for a T-junction arrangement.

3.81. This change to the nature of the approach to Ongar will have a significant impact on the current historic gateway to the town in this area, formed by the listed buildings of Marden Ash and Dyers, either side of the A113.

#### Highways

3.82. We note that limited work has been undertaken to date in regard to individual site accesses. This will need to be considered in greater detail during the preparation of the submission plan. In particular, further consideration will need to be given to the feasibility of new accesses direct onto the A414 from sites SR-0067i and SR-0168.

3.83. We understand that further traffic modelling will be undertaken for the district during the preparation of the submission Plan. This should include allowance for the future 'draw' of Crossrail

for commuter traffic. For Ongar this could increase traffic flow from the north through the High Street compared to current peak traffic flows, and could have particular implications for sites proposed for allocation to the north of the town.

#### 4. CONCLUSIONS

4.1. We have set out in our response to question 9 that the draft Plan that the housing target for the district under policy SP2 is not based on an up to date assessment of housing need, which must be rectified. Sufficient sites must be allocated to meet this need, plus a buffer of reserve sites to meet the requirement under paragraph 85 of the NPG regarding longer term development needs beyond the Plan period. The Plan must also allocate sufficient sites to meet the requirement under paragraph 85 of the NPPG regarding longer-term development needs beyond the Plan period. The Plan must also allocate sufficient sites to meet the requirement at paragraph 14 of the NPPF for the Plan to be able to respond to 'rapid change'. The Plan must look to allocate sufficient deliverable sites to provide for five years' worth of housing from adoption, accounting for persistent under delivery.

4.2. For Ongar, our response to question 2 establishes that self-sufficiency for Ongar is a requirement of paragraphs 17, 55 and 70 of the NPPF. In order to achieve this, we consider that evidence concerning the changing age profile of the town, the capacity in the town's schools and the health of the town centre indicates that this growth should increase from current growth rates, and that as such 600 dwellings should be the absolute minimum allocated to the town for the Plan period.

4.3. However, notwithstanding this, we consider that the evidence base establishes that Ongar is a sustainable location for further growth to address the as yet unmet housing need within the district. Paragraphs 17 and 34 of the NPPF encourage development to be located where the need to travel is minimised. Ongar, as one of the district's towns, is such a location. In addition, we consider that growth at Ongar would be a more sustainable response to meeting housing need than the expansion of North Weald.

4.4. It is however clear that draft Plan Policy P4 fails to allocate sufficient sites to deliver even 600 dwellings. This is a result of over estimates of capacity on allocated sites, and the inclusion of sites within the policy that have questionable availability and suitability.

4.5. Further sites should be allocated in Chipping Ongar not only for the town to be self-sufficient, but also to meet the housing need for the district.

#### Response to the Draft Local Plan Consultation 2016 (Regulation 18)

4.6. However, the application of the Site Selection Methodology to the selection of sites in Chipping Ongar is fundamentally flawed and results in the rejection of suitable, available and achievable sites.

4.7. The Site Selection Report fails to adopt an evidence based approach to both the selection and assessment of reasonable alternatives. The conclusions reached are not justified by the evidence base presented. Moreover, in part the evidence base is not proportionate - the Settlement Edge Landscape Sensitivity Study (Chris Blandford 2010) states it is at too large a scale to consider site allocations. Further, the Stage 2 Green Belt Review contains errors that need to be rectified.

4.8. As a result, the Site Selection Report fails to meet the requirements for sustainability appraisal, and does not produce a strategy for Chipping Ongar that can be said to be, "the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence" (NPPF paragraph 182).

4.9. In order to present an accurate picture of what the reasonable alternatives are for Chipping Ongar, a revised approach to the selection of sites for development should be adopted, based on identifying clear objectives for the town and allocating sites that best meet those objectives. This process should be justified with reference to the evidence base, and reported transparently.

4.10. We consider there are further suitable, available and achievable sites which should be allocated at Chipping Ongar, comprising sites SR-0090, SR-0053, SR-0457 and SR-0268. All sites are deliverable, and will assist in meeting the current shortfall in five year supply for the district. Further information concerning these sites is provided within appendices 1 - 3 of this representation.

Question 9: Do you wish to comment on any specific policies in the Draft Local Plan? Policy Number: SP2

## 1. INTRODUCTION

1.1. This representation to policy SP2 is in two parts. First, we have a number of concerns with the housing requirement figure. In summary:

- The housing requirement figure does not reflect the full objectively assessed housing need (OAHN) for the district, contrary to NPPF paragraph 47 bullet point 1.
- Given the plan does not propose to meet the full OAHN, the plan does not provide for a five years supply of housing contrary to NPPF paragraph 47 bullet point 2. Moreover, the plan does not address existing housing shortfall within the first 5 years of the Plan period, contrary to guidance set out within the NPPG.
- The plan does not propose to allocate sufficient sites to react flexibly to rapid change (paragraph 14 of the NPPF) or to ensure that green belt boundaries are capable of enduring beyond the end of the Plan period (paragraph 85 of the NPPF).

1.2. Second, we have a number of concerns with regard to the housing supply figures in policy SP2. In summary:-

- The density assumptions adopted are inappropriately high for a number of sites, and as a result the number of dwellings forecast to be achievable from the allocations made is overestimated.
- The density assumptions adopted call into question whether housing across the district could provide the mix of housing set out in the most up to date SHMA, given the overwhelming need for houses rather than flats.
- Owing to errors within the housing trajectory at appendix 5 of the draft Plan concerning sites at Harlow, overly optimistic assumptions have been made in regard to the ability of these sites to contribute to the deliverable supply of housing in the first five years of the Plan period.
- A number of allocated sites have questionable availability declared within the evidence base. Their inclusion does not meet the requirement for the Plan to allocate deliverable and developable sites, as set out at paragraph 47 of the NPPF. These sites should be discounted.
- A number of allocated sites have questionable suitability due to the presence of ongoing uses without a policy compliant strategy for their re-provision, these sites should be discounted.

## Response to the Draft Local Plan Consultation 2016 (Regulation 18)

- Meeting education and other infrastructure requirements will further reduce site capacities, allowance must be made for these uses when calculating site capacities
- There are some errors within the Plan which reduce the overall number of houses provided from that stated.

## 2. MEETING THE OBJECTIVELY ASSESSED HOUSING NEED IN THE DISTRICT

2.1. This first part of our representation considers how the Plan determines the housing requirement figure and the requirement for a five year supply of deliverable sites.

### Housing Requirement Figure

2.2. Draft policy SP2 indicates the Local Plan should provide 11,400 dwellings between 2011 – 2033, based on the findings of the 2015 Strategic Housing Market Assessment (SHMA). However, 'Updating the Overall Housing Need: Based on 2014-based projections for West Essex & East Herts' (ORS, August 2016), outlines that the updated objectively assessed housing need for Epping Forest District is 13,278 dwellings for the period 2011 – 2033.

2.3. Examination of the Plan is not expected until autumn 2017, with adoption following in autumn 2018. It would not be tenable for the Council to rely on the 2015 SHMA figures, which will be 3 years out of date by the time the Plan is adopted. The NPPG states that (Paragraph: 016 Reference ID: 2a-016- 20150227) "Wherever possible, local needs assessments should be informed by the latest available information. The National Planning Policy Framework is clear that Local Plans should be kept up-to- date." Policy SP2 must refer to a housing requirement based on up to date evidence, currently that within the 2016 ORS report, or more robustly, a full update of the SHMA which should be undertaken prior to the preparation of a submission stage draft.

### Five Year Housing Land Requirement

2.4. We have a number of concerns with regard to the Council's proposed approach to calculating the five year housing requirement figure, as set out in appendix 5 of the draft Plan:

- The calculation reflects a housing target figure that is not based on an up-to-date assessment of need. The housing requirement figure of 13,278 should be the basis of calculating the five years supply (604 dwellings per annum).
- It applies only a 5% buffer, not 20%. We consider 20% is appropriate given the under-delivery since 2011 below the 604 dwellings per annum requirement.
- It would appear (although it is not at all clear from the information presented) that the Council have adopted a 'Liverpool' approach to addressing the shortfall in delivery in the pre-plan period (prior to 2015/16), looking to address the shortfall over the entirety of the Plan period. We consider a 'Sedgefield' approach is consistent with national policy, with the shortfall being addressed during the first five years of the Plan period.

### Housing Target

2.5. As set out at paragraphs 2.2 and 2.3 above, it is clear that draft policy SP2 must set out the up-to- date OAHN as the housing requirement figure. As such, this figure, equating to 604 dwellings per annum, must be the basis of calculating the five year supply of housing.

### Buffer

2.6. NPPF Paragraph 47, bullet point 2 requires that local authorities, "identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land"

2.7. We do not consider it is tenable that Epping Forest's housing delivery continues to be assessed against the housing target in the now defunct East of England Plan. We consider that the up-to-date objectively assessed housing need figure should be the benchmark, back to the beginning of the plan period in 2011. This is the approach that has been adopted by East Herts Council in their submission draft plan.

## Response to the Draft Local Plan Consultation 2016 (Regulation 18)



2.8. This approach indicates that Epping Forest have delivered less than this figure for every year since 2011 and will continue to do so until 2016/17. We consider this constitutes 'persistent under-

delivery' and that a 20% buffer should be applied, not the 5% suggested. Once again, in East Herts a similar record of under delivery has resulted in the application of a 20% buffer.

#### Liverpool vs Sedgefield

2.9. It would appear (although it is not at all clear from the information presented) that the Council have adopted a 'Liverpool' approach to addressing the shortfall in delivery in the period prior to adoption (prior to 2015/16) - spreading the shortfall accruing during this period over the entirety of the remainder of the Plan period. We consider a 'Sedgefield' approach is consistent with national policy, with the shortfall being addressed during the first five years of the Plan period.

2.10. The NPPG (paragraph 036-20140306) provides advice on how local planning authorities should deal with past under-supply. It states, "Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the 'Duty to Cooperate'."

2.11. We do not consider that adopting a 'Liverpool' approach meets the requirements of paragraph 47 of the NPPF to 'boost significantly' the supply of housing, and nor does it accord with the guidance set out in the NPPG. We note that East Herts are intending within their draft Submission Plan to meet their shortfall within the first five years of their plan period.

2.12. It is clear that there is a significant deficiency in the supply of housing in the first five years of the plan and further deliverable housing sites will need to be allocated. We consider that there are further deliverable sites (see our response to question 6).

#### Reserve Sites and Buffer for Rapid Change

2.13. Policy SP2 lists allocations for 11,290 dwellings. These allocations, together with completions since 2011, extant planning consents and an allowance for windfalls, suggest a total housing supply provided for within the Local Plan of 14,252 dwellings; some 974 dwellings in excess of the updated August 2016 OAN for the district, or a 7% buffer. The buffer over the now out of date OAN equates to 25%.

2.14. Section 2.8.3 on page 27 of the Site Selection Report outlines that, "...the Council proposes to allocate 88 sites and take into account an allowance for circa 225 homes on part of the North Weald airfield site, which will in total support the delivery of approximately 7,200 homes across the District. This is in excess of the 4,450 homes needed to meet the objectively assessed housing need in the District and ensures a sufficient number of reserve sites should the status of any of the sites identified for allocation change during the Draft Local Plan consultation or up to the examination of the Local Plan."

2.15. The table provided at figure 3.5 outlines the need for reserve sites to be allocated. The note beneath figure 3.5 outlines that, "The Council is required to ensure that the Local Plan includes sufficient flexibility to adapt to rapid change (para 14 NPPF). The inclusion of reserve sites in the Draft Local Plan includes some flexibility for sites dropping out during the consultation and up to examination and will provide flexibility once the Plan is adopted should allocated site fail to deliver. This will also help to ensure that the Council can ensure that sufficient land can be made available to meet the five year land supply requirements on an ongoing basis."

2.16. Paragraphs 3.62 and 3.63 of the draft Plan outline that, "The identified housing supply to 2033 exceeds the requirement. This serves two functions. Firstly, it provides to a contingency to allow for flexibility. Contingency planning is necessary to allow for eventualities beyond the Council's control...Secondly, as identified in paragraph 3.48, the Council recognises that recent household projections demonstrate a further upward trend in housing need and the identification of additional sites demonstrates the Council's commitment to positive planning."

2.17. Finally, Paragraph 3.97 of the draft Local Plan outlines that in regard to Green Belt, "...it will also be necessary to identify land to be safeguarded to meet future development needs." And that, "It is considered likely that further development on land that is currently within the Green Belt will be required." The draft outlines that the extent of safeguarded land as required under NPPF paragraph 85 is still being considered.

#### Response to the Draft Local Plan Consultation 2016 (Regulation 18)

2.18. The above extracts from the draft Plan and its evidence base highlight three factors that together determine the extent of the appropriate 'buffer' – first, the need under paragraph 14 of the NPPF to have 'sufficient flexibility to adapt to rapid change', secondly a reflection that the status of sites may change between now and examination, and finally to meet the requirement at paragraph 85 to meet longer term development needs, by allocating safeguarded land.

2.19. We doubt that a 7% buffer is adequate to deal with the above three factors. We acknowledge that the further work being undertaken by the Local Authority from now until Submission will work towards eliminating as far as possible the second of the three contributions to the size of the buffer, however this does not seem adequate justification to drop the buffer from 25% to 7%.

2.20. It is clear that further allocations for residential development will need to be made during the preparation of the submission stage Plan.

### 3. HOUSING SUPPLY

3.1. This part of our representation concerns supply side issues, and whether the sites currently proposed for allocation will deliver the housing numbers envisaged both over the Plan period and in the first five years of the plan.

#### Density Assumptions

3.2. Our response to question 6, regarding Chipping Ongar (draft policy P4) sets out in detail our concerns regarding the approach taken to assessing density within the town. This results in an over-estimation of the capacity of allocated sites and throws doubt on the ability of the Plan to deliver the number of houses outlined for the town.

3.3. Our concerns regarding the over estimation of densities on settlement edge sites in Chipping Ongar are equally relevant for settlement edge sites in other towns. For the reasons set out in our response to question 6, if all those settlement edge sites in Epping were given a maximum density of 30dph housing delivery would reduce by some 15% in Epping. Whilst, as noted in our response to question 6, the overall reduction in numbers may not be as acute, taking into account the ability of larger sites to deliver higher densities towards the centre of the sites, there is little doubt that there is a significant risk that densities have been overestimated on many sites.

3.4. The lack of a clear evidence based approach to assessing density, leading to arbitrary decision making on site capacities, is evident when interrogating the site capacity and delivery assessments within appendix B1.6.4 of the Site Selection Report (SSR). For example, it is notable that site SR-0132Ci in Epping (Epping Sports Club), approximately 25% of the site area is proposed to be developed, equating to 2.23 ha, allowing for 10% gross to net, the resulting density is 25 dwellings per hectare.

The justification for this is that "...density further reduced as surrounding development is of a lower density." However, no other sites in similar contexts have had their capacities reduced to reflect lower density housing surrounding - SR-0113B, to the south of Epping, similarly adjoins an area of lower density housing, yet no adjustment has been made. There is no quantitative assessment of what 'adjacent to lower density' actually means, and it is not a defined part of the Site Selection Methodology (SSM). The conclusion reached on the Epping Sports Club site indicates it perhaps should be.

3.5. We note a similar arbitrary amendment to site density is proposed at site SR-0361, Colebrook Lane/Jessel Drive Amenity Open Space in Loughton. Here, baseline density is assumed at 45 dph, but a 10% reduction in density is proposed because, "Low density, suburban setting and character of surrounding development likely to require reduction in density. Density reduced accordingly." It is not at all clear why such a conclusion has been reached on this site, when the density of development surrounding other allocations in the district is similarly low density and suburban – such as other sites in Loughton (e.g. Borders Lane Playing Fields, or Sandford Avenue/Westall Road Amenity Open Space).

3.6. As is clear within our response to question 6, a comprehensive settlement by settlement appraisal of appropriate densities and site capacities is required to avoid the Plan being found unsound as a result of not being justified by a robust evidence base.

#### Meeting the SHMA Housing Mix

### Response to the Draft Local Plan Consultation 2016 (Regulation 18)

3.7. Paragraph 2.8.5 of the Site Selection Report (page 31) outlines in table 2.12 the obvious consequence of a high density approach, with the suggested strategy over-reliant on the provision of flats, and under providing three, four and four plus bed houses, when compared with the housing mix set out in figure 76 of the 2015 SHMA. A failure to provide an appropriate housing mix would contravene paragraphs 47 and 151 of the NPPF, which requires that Local Authorities must understand and meet assessed needs in their district. If this is not rectified, the Plan risks being found unsound on the basis of a failure to be positively prepared and failing to be consistent with National Policy. Properly meeting need would require a reduction in development densities, and would result in a consequent reduction in the number of houses achievable from the allocated sites.

### Housing Trajectory

3.8. Paragraph 47 of the NPPF requires Local Authorities to demonstrate a five year supply of deliverable sites, plus a 5% or 20% buffer. We have outlined above our concern that the five year requirement presented at Appendix 5 of the draft plan does not reflect national policy for the calculation of housing supply in the first five years of the plan. This part of our representation raises concerns with regard to the phasing of sites included within the five year period.

3.9. We note that the trajectory provided at appendix 5 includes development from the sites around Harlow within the first five years. The information included for these sites is based on the phasing presented within table 2 page 65 of the AECOM Harlow Strategic Site Assessment. It would however appear that in transposing this information into the trajectory presented at appendix 5, no account is taken of the advice at page 62 of the AEOM report. This outlines that (with our emphasis), "It would not be unusual, where there is an up to date development plan in place and the principles are not contentious, for a large planning application to take 9 months to progress (including the period of pre-application discussions and post approval legal process). It is likely then to take a further 9 months to start on site and then 9 months to a year before the first new homes have been completed and are ready for occupation. This period of 2 to 2½ years as a minimum needs to be factored into any phasing programme."

3.10. The trajectory provided at appendix 5 assumes the first houses to be delivered at West Sumners will be in 2018/19, and at Latton Priory and West Katherines in 2019/20. For West Sumners, to achieve this the start of the 2 - 2.5 year period would be now, i.e. the application would need to be submitted in 9 months' time, ahead of Submission of the Local Plan for Examination. This is clearly an error - the advice from AECOM quoted above outlines that the 2.5 year period should commence from the date an up-to-date Plan is in place, i.e. for Epping Forest the October 2018 adoption date. As such, the phasing for all three Harlow sites should be moved out to reflect this. This will have a significant impact on the contribution these sites make to the five year supply of housing and indicates that further deliverable sites will need to be allocated.

3.11. Notwithstanding the above, beyond the Harlow sites the information in the trajectory supplied with the draft Local Plan is deficient. It is not possible to understand from the trajectory whether the Plan meets the requirements in paragraph 47 of the NPPF in regard to allocating sufficient deliverable sites in years 1 - 5 as the trajectory is not provided on a site by site basis. Paragraph 023 Reference ID: 3- 023-20140306 asks "How should the timescale and rate of development be assessed and presented?"

The guidance then sets out (with our emphasis) that "The local planning authority should use the information on suitability, availability, achievability and constraints to assess the timescale within which each site is capable of development."

### Availability

3.12. The NPPF makes clear at paragraph 47 that Local Authorities must identify and update annually a supply of specific deliverable sites for the first five years of the plan, and identify a supply of specific developable sites for the period for years 6 - 10, and where possible years 11 -15.

3.13. Footnote 11 outlines that to be deliverable sites should be 'available now'. To be developable, "there should be a reasonable prospect that the site is available". The NPPG (Paragraph 020 Reference ID: 3-020-20140306) sets out what factors should be considered when assessing availability, stating that on the 'best information' there must be 'confidence' that there are no legal or ownership problems, including the operational requirements of landowners. The paragraph states that, "Where potential problems have been identified, then an assessment will need to be made as to how and when they can realistically be overcome."

## Response to the Draft Local Plan Consultation 2016 (Regulation 18)

3.14. Appendix B1.6.5 of the Site Selection Report, 'Results of Identifying Sites for Allocation' comprises the final sieve stage of the allocation process. However, a number of sites suggested for allocation are stated as having unknown availability, in whole or part, or as being subject to ransoms, including the following:-

- St Margaret's Hospital, Epping - 181 dwellings
- Mill Lane High Ongar - 10 dwellings
- Loughton Resource Centre - 35 dwellings
- Loughton Library Adjacent Car Park - 44 dwellings
- Lower Nazing South Area - 88 dwellings
- St Clements, Vicarage Lane West - 11 dwellings
- Waltham Abbey Community Centre - 53 dwellings

3.15. In addition to the above, Waltham Abbey Fire Station (SR-0219) is allocated for 44 houses. The 2016 SHLAA and Site Selection Report suggests the site is available within the next 10 years but no strategy is set out for the re-provision of the building. If this is to be re-provided within one of the new

developments around the town then consequent adjustment in the site capacity of the recipient site would be required and viability (i.e. achievability) would need consideration.

3.16. Contrary to the requirements of the NPPG, there is no assessment made as to how and when constraints identified for the above sites can be overcome.

#### Suitability

3.17. Our response to question 6 regarding Chipping Ongar outlines concerns with regard to the suitability of Epping and Ongar Leisure Centres and the Stag Pub to accommodate housing, given their ongoing community use and the requirement within the NPPF to maintain sports and recreation provision in a 'suitable location' (paragraph 74) and guard against loss of community facilities and services (paragraph 70).

3.18. Similar issues are raised by the allocation of Coopersale Cricket Club - SR-0405. The Site Selection Report sets out that an alternative site for the cricket club has been identified, however this has not been identified in the draft Plan and as such the suitability of the current cricket club for development cannot be judged within the guidance in paragraphs 70 and 74 of the NPPF, as outlined above. Any alternative site for the Club would also need to be removed from the green belt given the constraints of change of use to playing pitches in the green belt following recent high court cases (for example Timmins v Gedling Borough Council 2015), and as such this alternative site should feature as an allocation within the Plan.

#### Education and Infrastructure Provision - Site Capacity

3.19. This draft of the Local Plan does not provide a strategy for meeting education needs. The draft Infrastructure Delivery Plan outlines a range of strategies that could be utilised to meet educational need, and this includes new primary and secondary provision, as well as the expansion of existing schools. However, within the site allocations, no allowance is made within site capacities for the provision of new schools (or, where appropriate, the expansion of existing schools). As such, it seems likely that achievable site capacities will fall once an education solution for the district is established.

3.20. No allowance has been made within the North Weald allocations for the re-provision of the Epping and Ongar Leisure Centres. Whilst allowance is made within the Masterplanning Study for a small scale sports facility to serve the community only, the allocations set out under policy P6 make no

allowance within their capacities for the scale of facility that will be required. Any playing fields will need to be allocated within the Local Plan, given the findings of recent case law concerning the change of use of land in the green belt (see for example Timmins v Gedling Borough Council 2015).

## Response to the Draft Local Plan Consultation 2016 (Regulation 18)

3.21. We note the proposal for the relocation of Princess Alexandra Hospital to land to the east of Harlow. If this is carried forward, this could impact on the capacity of the site to deliver housing, further suppressing housing supply from the pool of allocated sites.

3.22. Finally, none of the allocations where traveller sites are proposed include consequent downward adjustment to site capacity given land take for this use.

#### Errors

3.23. There has been double counting at Epping South, appendix B1.4.2 outlines that the capacity of site SR-0069 extends to 79 dwellings. The capacity assessment of SR-0069/33 returns a figure of 255 dwellings. However, the capacity assessment refers to a site which includes the land comprising SR- 0069, i.e. the 255 dwelling figure includes the 79 dwellings arising from this site, resulting in 79 dwellings being double counted.

3.24. The sum of the allocations for each settlement in Chapter 5 of the draft Plan does not equate to figures reported in the table in policy SP2, due to rounding up. Because a policy of rounding 'up' to the nearest 10 has been used (rather than the usual convention of rounding up or down to the nearest 10, if indeed rounding is adopted) then the settlement totals given in policy SP2 overstate the number of dwellings allocated within the policies in Chapter 5. If a policy of rounding to the nearest 10 is to be adopted then it should follow convention, to avoid further over estimates of site capacities.

3.25. Whilst these errors may in isolation appear minor, cumulatively, and together with the other issues outlined earlier in this representation, they contribute to the inability of the draft Local Plan to meet the full Objectively Assessed Housing Need for the district.

#### 4. CONCLUSION

4.1. The housing target for the district under policy SP2 is not based on an up to date assessment of housing need, which must be rectified. Sufficient sites must be allocated to meet this need, plus a buffer of reserve sites to meet the requirement under paragraph 85 of the NPPF regarding longer-

term development needs beyond the Plan period. The Plan must also allocate sufficient sites to meet the requirement at paragraph 14 of the NPPF for the Plan to be able to respond to 'rapid change'. The Plan must look to allocate sufficient deliverable sites to provide for five years' worth of housing from adoption, accounting for persistent under delivery.

4.2. Whilst the draft Plan suggests that sufficient sites have been allocated to meet the requirements outlined in the previous paragraph, we do not consider that assumptions made in regard to site capacity, availability and suitability of sites are robust for a significant number of sites proposed for allocation. Nor do we consider robust assumptions have been made in regard to the deliverability of sites in the first five years of the Plan period.

4.3. Further, the absence of allowances within the calculation of site capacities for education provision, gypsy and traveller sites, a relocated Princess Alexandra Hospital and a new Leisure Centre at North Weald further reduces the capacity of the sites allocated below their estimated potential within the draft Plan. Finally, there are a number of errors within the Plan, the correction of which will reduce the overall number of houses able to be brought forward.

4.4. As a result of the above, we consider that the Plan risks failing to be found sound in the absence of further allocations for housing being made. We consider that there are further deliverable sites which should be allocated. Our response to question 6 outlines three such sites.