

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

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Method	Letter			
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### Letter or Email Response:

1.1 My client has secured the land outlined in red on the plan at APPENDIX A. 1.2 He supports the Council's Local Plan ("LP") strategy to deliver a minimum of 11,400 homes in the period 2011-2033. He also supports the allocation in the draft LP of site SR-0049 at Fyfield. 1.3 The NPPF and draft LP objectives encourage the re-use of previously developed land ("PDL"). 1.4 My client supports the sequential approach to site selection which favours the allocation of PDL in the Green Belt before the allocation of green field land on the edge of settlements. 1.5 The whole of this site is PDL. There is existing PDL on all sides of the site. The effect of building on site SR-0049 would be to almost completely surround it with brownfield development. 1.6 It is well located in relation to village services and public transport and there are no other constraints which would affect the principle of the site's development. 1.7 The redevelopment of the site would prevent a number of houses having to be built on non-PDL Green Belt land elsewhere. 1.8 The site is suitable and available for development and the implementation of the draft LP strategy demands the allocation of the site for housing. 2.0 SITE LOCATION AND DESCRIPTION 2.1 The site has an area of 0.84ha and lies to the west of Ongar Road and the north of Moreton Road. It has an irregular shape. The main vehicular access is from Ongar Road. A 3.5m wide access road leads into a tarmacked car park of 0.1ha. To the south of the car park is a building formerly used as a restaurant. The open land to the east of the restaurant building and south of the main vehicular access has in recent times always been in the same ownership as the restaurant and car park and has always been used for purposes incidental and ancillary to the restaurant. 2.2 The substantial building in the north-western corner of the site has a history of use for storage and general industrial purposes and has a right of way from Moreton Road. 2.3 The site is broadly level and, apart from the buildings and hard surfaces, is grassed with some trees. There are four trees to the west of the car park which are protected by a TPO, and these would be retained as part of any new development. 2.4 To the west of the restaurant building there are substantial buildings occupied by: Chandelier Cleaning Services Limited as their workshop premises and associated offices; by Specialist Property Services; and by Specials Lighting Design. 2.5 To the north of the site is Woolmongers Cottage with associated stables, menage and horse paddocks to the rear. 2.6 To the south are dwellings at Nottage Croft, Lydford Lodge and Mill Hatch. 2.7 Opposite the site access to the south east are dwellings at 49-57 Ongar Road including the former police office. 3.0 DRAFT LOCAL PLAN STRATEGY 3.1 The Draft Plan Objectives at paragraph 3.26 of the draft LP state include, under the heading 'Environment and Design': - "... to protect the Metropolitan Green Belt within its revised boundary, and to encourage the re-use of previously developed land." 3.2 At paragraph 3.44 the draft LP states: - "Responses from the Community Choices consultation and stakeholder engagement included: "Housing • continuing to protect the Green Belt wherever possible; [and] • using "brownfield" (i.e. previously developed) land before releasing any Green Belt for development." 3.3 At paragraph 3.54 the draft LP states: - "The Council is proposing that remaining housing need identified for

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

Epping Forest District will be delivered by taking a sequential approach to where new homes will be provided. In determining the appropriate sites the Council has taken account of the consultation responses which considered that new housing should be distributed across the District together with the evidence on sites put forward and in the draft policy and environmental constraints in the District. The approach to the allocation of sites has been to take each settlement and consider the most appropriate sites in accordance with the following order of priority: 1. A sequential flood risk assessment - proposing land in Flood Zone 2 and 3 only where need cannot be met in Flood Zone 1; 2. Sites located on previously developed land within settlements 3. Sites located on open space within settlements where such selection would not adversely affect open space provision within the settlement. 4. Previously developed land within the Green Belt (in anticipation of the NPPF being updated to take account of the proposed changes published in December 2015)."

3.4 The NPPF Core Planning Principles at paragraph 17 include to:- "Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value."

3.5 The NPPF repeats at paragraph 111: - "Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value."

3.6 The Council's housing land requirements cannot be met without developing on Green Belt land. It is in accordance with the NPPF and the Council's own strategy says that opportunities for developing on PDL in the Green Belt should be considered ahead of open, green-field sites.

4.0 COMPLIANCE WITH COUNCIL'S STRATEGY

4.1 The site is in Flood Zone 1. 4.2 The site contains open land which is within the settlement, but this open space is not usable by the public and does not make a significant contribution to amenities (other than the TPO'd trees which would be retained). The survey responses reported in the 2008 parish appraisal criticised the present appearance of the Gypsy Mead site. 4.3 Previously developed land is defined at Annex 2 of the NPPF as: - "Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time."

4.4 The land is occupied by a general industrial building and a restaurant building, most recently known as the Haque Empire. Apart from the building there are a hard-surfaced car park and access road and the adjoining open land that was used in connection with the restaurant. 4.5 Therefore the whole of the site is previously developed land and, in accordance with the draft LP strategy and NPPF, it should be a priority for development above undeveloped, open Green Belt land. 4.6 The site is already a candidate for development by virtue of paragraph 89 of the NPPF, which supports the redevelopment of previously developed land in the Green Belt, and by virtue of paragraph 90 of the NPPF, which supports the change of use of permanent and substantial buildings in the Green Belt.

5.0 VILLAGE CONTEXT

5.1 The plan at APPENDIX B shows that the site is already virtually surrounded by existing development: - • To the west: Chandelier Cleaning Services Limited, Specialist Property Services and Specials Lighting Design • To the south: Nottage Croft, Lydford Lodge and Mill Hatch. • To the east: 49-57 Ongar Road including the former police office. • To the north: Woolmongers Cottage, stables, menage and associated horse paddocks (also PDL as they are curtilage land used for grazing and exercising horses kept in the stables at the site).

5.2 The development of the land allocated at site SR-0049 would complete the enclosure of the site on its south eastern side and would alter the centre of gravity of the village to bring it southwards, closer to Gypsy Mead. Accessibility

5.3 Paragraph 55 of the NPPF says: - "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities."

5.4 The village possesses a range of services and facilities including: - • St. Nicholas Church. • Post Office and Village Store. • Dr. Walkers C of E Primary School. • Fyfield Pre-School. • The Black Bull and the Queen's Head Public Houses. • Village Hall with numerous clubs and societies • Village Sports Ground. • No. 46 Bus: Regular Service Monday to Saturday Service between Chelmsford Ongar from Bus Stops opposite Site. 5.5 The satellite image at APPENDIX C shows the site in relation the rest of the village and its amenities. 5.6 Not only would new housing at Gypsy Mead benefit from the good range of existing village services, it would help sustain them in the long term and help encourage the provision of new services to the benefit of all existing residents. My client is also willing to discuss specific practical measures to support the Village Store.

6.0 CONCLUSIONS

6.1 This site occupies a prominent location at the southern end of Fyfield but in its present condition does not make a significant contribution to the amenities of the village. 6.2 The Council has acknowledged Fyfield as a suitable location for development by allocating

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

site SR-0049 for development. 6.3 The Council's strategy supports the re-development of PDL ahead of the development of open, green field, Green Belt land. 6.4 The whole of the site is PDL, and it is virtually surrounded by PDL. 6.5 Housing could be built on the site without harming the TPO'd trees. 6.6 The site is under the control of a developer and so is both suitable and available for development in the short term. 6.7 The LP would be unsound if this site was overlooked and non-PDL Green Belt land allocated instead. APPENDIX A SITE LOCATION PLAN APPENDIX B SITE CONTEXT PLAN AERIAL VIEW OF SITE IN VILLAGE CONTEXT The site is well located to the amenities and services located in Roydon village and public transport links including Roydon railway station;