



H I L L B R E A K

Ongar Park Estate North Weald Bassett Sustainability Report

Submitted by Peer Group plc as part of the Regulation
19 response to the Public Consultation on the Epping
Forest District Draft Local Plan

26 January 2018



PEER GROUP PLC

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This Sustainability Report was originally prepared by Hillbreak Limited (Hillbreak) for Peer Group plc in support of its representations to the Regulation 18 consultation on the Epping Forest District Draft Local Plan Consultation in 2016 (the “Draft Local Plan”). It is being resubmitted in support of its representations to the Regulation 19 consultation on the Epping Forest District Draft Local Plan Consultation in 2018. Attention is drawn to the limitations of use described on the rear cover of this Report.

Peer Group plc owns land known as the Ongar Park Estate (OPE), located immediately to the southeast of North Weald Bassett, a large village in the heart of the District. The OPE is private land, with public access limited to designated footpaths. It has been actively promoted by Peer Group plc as suitable for residential development, starting with formal consultation on the Council’s Local Plan ‘Issues and Options’ consultation in 2012. However, the OPE has not been allocated for development in the Draft Local Plan.

The combined potential of all sites that have been allocated in the Draft Local Plan for housing development is not sufficient to meet the Objectively Assessed Need (OAN) for housing over the plan period. Furthermore, the OAN is based on outdated evidence and as such does not reflect the full extent of the housing need within the District.

Within this context, this Sustainability Report assesses whether the decision taken by Epping Forest District Council (EFDC) not to allocate development at the OPE within the Draft Local Plan has been informed by sound evidence and conclusions from a sustainability perspective.

In so doing, it seeks to assess:

- whether directing greater levels of housing growth to North Weald Bassett would be consistent with the presumption in favour of sustainable development enshrined in the National Planning Policy Framework;
- whether the part of the OPE that has been proposed by Peer Group plc for housing has been assessed accurately and fairly with respect to its potential contribution to the sustainable development objectives of the District;
- whether the OPE development opportunity would provide a sustainable solution to delivering housing need in the village of North Weald Bassett; and
- by comparison, whether the allocation of sites to the northwest of North Weald Bassett on high quality agricultural land or in close proximity to the active airfield is the most appropriate strategy.

In considering these key points, this Sustainability Report is structured as follows:

- Firstly, investigating the component elements of the definition of sustainable development enshrined in the *National Planning Policy Framework*, and the contribution that the delivery of Objectively Assessed Housing need at North Weald Bassett would make to those sustainable development principles;
- Secondly, considering whether the *Interim Sustainability Appraisal (SA)* by AECOM, published alongside the Draft Local Plan makes a sound assessment of the sustainability implications of directing greater levels of housing development to North Weald Bassett, as well as the comparative assessment of the effects of the more limited allocations expressed through the preferred allocation option; and
- Thirdly, appraising whether the EFDC-commissioned *Site Selection Report (September 2016)* by Arup, which has been used to guide decisions on site allocations across the district, provides a fair and representative assessment of the specific OPE development opportunity, alongside other potential development sites (both allocated and unallocated in the Draft Local Plan) at North Weald Bassett. In so doing, this Sustainability Report seeks to provide an accurate and objective view of the sustainability benefits and impacts of the OPE compared to the other potential development sites at North Weald Bassett, including those allocated and not allocated in the current Draft Local Plan.

This Sustainability Report, in part, reflects and comments upon the *Interim SA* prepared by AECOM for EFDC, dated September 2016, and published alongside the Draft Local Plan. It should be noted, however, that it does not investigate, nor does it seek to challenge, the adherence of the *Interim SA* with the requirements of the Planning & Compulsory Purchase Act 2004 or the Environmental Assessment of Plans and Programmes Regulations 2004.

This Sustainability Report has been informed by a desktop study of documentation in the public domain, together with assistance from expert consultant reports which have been commissioned by Peer Group plc to inform and support its representations to EFDC.

The presumption in favour of sustainable development

The *National Planning Policy Framework (NPPF)* must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions. It sets out the Government's planning policies for England and establishes that the purpose of the planning system is to contribute to the achievement of sustainable development.

It highlights that there are mutually-dependent economic, social and environmental dimensions to sustainable development, whereby the planning system has:

- * **an economic role** by contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- * **a social role** by supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- * **an environmental role** by contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

Local Planning Authorities should adopt a presumption in favour of sustainable development (the so-called “**golden thread**” of the planning system), such that Local Plans meet objectively assessed needs in full (NPPF, paragraph 47) with sufficient flexibility to adapt to rapid change and to take account of longer-term needs (NPPF, paragraph 157). Decisions taken in a development control context should be positive where proposals accord with the development plan.

The NPPF states that, to achieve sustainable development, “economic, social and environmental gains should be sought jointly and simultaneously through the planning system”. This means that Local Planning Authorities should plan positively to achieve economic, social and environmental benefits in combination; in so doing it needs to be recognised that development, especially when brought forward in the context of an effective policy framework, can bring about joint environmental, economic and community advantages.

Many of the Strategic Policies contained in the Draft Local Plan reflect this emphasis on sustainable development. Policy SP1, for example, confirms that Epping Forest District Council recognises the importance of pursuing sustainable development for the District and to give favourable consideration to proposals which will contribute towards delivering: a strong, flexible and sustainable economy; the protection and enhancement of the natural, built and historic environment; the prudent use of natural resources; mitigation and adaptation to climate change; and which support strong, vibrant and healthy communities.

The NPPF addresses several themes that are pertinent to the objective of delivering sustainable development. As this Report demonstrates, and based on well established principles of good place-making and spatial planning, the positive planning of housing development at OPE can contribute favourably to the vast majority of these themes in the following ways:

- **Building a strong, competitive economy** - focusing appropriate levels of housing development and related uses in North Weald Bassett, which is listed in the *Interim SA* by AECOM as one of five main employment areas within the District.
- **Ensuring the vitality of town centres** - promoting town [and village] centre environments to support their viability and vitality is an essential economic pillar of the planning system. Specifically, the NPPF directs local planning authorities to “recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites”. Planning positively for residential development at North Weald Bassett would be entirely consistent with this principle. Furthermore, by diversifying the demographic of North Weald Bassett whilst accommodating some of the potential shortfall between Objectively Assessed Need and the capacity of the Draft Local Plan, the vitality of North Weald Bassett village can be enhanced.
- **Supporting a prosperous rural economy** - this principle is inextricably linked to ensuring the vitality of town [and village] centres, whereby promoting the retention and development of local services and community facilities in villages through positive planning for residential development is fundamental to securing a prosperous economic future for rural areas. The North Weald Bassett Masterplanning Study prepared by Allies and Morrison, September 2014 confirms that the village benefits from a primary school, GP surgery, library, supermarket, shops, village pubs, industrial areas and an airfield museum, all of which would be positively supported by greater housing numbers.

- **Promoting sustainable transport** - local planning authorities are required to support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. North Weald Bassett is connected by bus services to the Central Line at Epping and onward connections to central London. North Weald performs well against the wider settlements identified in the Draft Local Plan and development located at North Weald Bassett would comparably reduce car dependency as well as the associated reduction in CO2 emissions. Further development at North Weald Bassett will further expand the demand for sustainable transport.
- **Supporting high quality communications infrastructure** - this is generally not a matter that is relevant to the location of housing development in the District, where mobile network coverage and internet access, for example, is generally good according to Ofcom.
- **Delivering a wide choice of high quality homes** - Housing affordability in the District is cited in the Draft Local Plan as being a significant problem as a consequence of being an area that is attractive city commuters. For North Weald Bassett, 8.9% of people take the London Underground to work and reflects the number of people that are travelling to London on the Central Line. Increasing the supply, affordability and choice of homes in the village should therefore be viewed as a sustainable development imperative.
- **Requiring good design** - this is generally not a matter that is location-dependent, although it is worth noting that there are no viability constraints to outstanding design at North Weald Bassett.
- **Promoting healthy communities** - bringing forward housing development which incorporates high quality green infrastructure and good connectivity to other local facilities can help to address low levels of physical activity. Increasing the housing at North Weald Bassett will continue to enhance local facility availability and the potential opportunity for a country park around Ongar Redoubt highlights the access to green space that could be provided.
- **Protecting Green Belt land** - over 92% of the District is designated as Green Belt and the Draft Local Plan recognises that meeting Objectively Assessed Needs with respect to housing cannot be achieved without taking land out of the Green Belt; the challenge, therefore, is to identify the most suitable and sustainable sites to be released from the Green Belt. This should be an evidence-based sequential approach. EDFC sets out its sequential approach to where new homes will be provided in Paragraph 3.54 of the Draft Local Plan and shows that development should avoid the loss of high grade agricultural land. The Environmental Issues Report submitted as part of the Regulation 19 representations for OPE confirms that the proposed development area is classified as non-agricultural and should therefore be prioritised over development sites on agricultural land located to the north and west of North Weald Bassett.
- **Meeting the challenge of climate change, flooding and coastal change** - North Weald performs well against the wider settlements identified in the Draft Local Plan for housing allocations. Development at North Weald Bassett would therefore reduce car dependency as well as the associated reduction in CO2 emissions that contribute to climate change. Moreover, land at Ongar Park is not part of any floodplain and is all within Flood Zone 1, determined by the Environment Agency as being at least likelihood of flooding.
- **Conserving and enhancing the natural environment** - development at North Weald Bassett does not imply a threat to the natural environment; increasingly it is understood that quality residential development can lead to natural conservation benefits, including, for example, by providing the resources for the better management of sensitive sites and delivering net increases in biodiversity through greater habitat and species diversity. This is demonstrated at OPE with the potential to improve open space around the Ongar Redoubt and enhance ecological value of the surrounding area.
- **Conserving and enhancing the historic environment** - the *Land at Ongar Park Report, 2012* carried out by Capita Symonds considers an area of land which extends beyond that proposed for development at OPE but confirms that the full extent of the area proposed for development has not been identified to include finds of archaeological significance. The *North Weald Site Appraisal, 2016* prepared by Omega Partnership provides the masterplan for the OPE site and confirms that the proposed buffer surrounding Ongar Redoubt on page 118 of the *Allies & Morrison North Weald Bassett Masterplanning Study* commissioned by EDFC has been incorporated in the development proposals.
- **Facilitating the sustainable use of minerals** - this is generally not a matter that is relevant to housing development at North Weald Bassett.

Interim SA of the Draft Local Plan and the effects of higher growth at North Weald Bassett

Background

The *Interim SA* of the EFDC Draft Local Plan aims to appraise the preferred approach to settlement allocations, as set out in the Draft Local Plan Policy SP2, against four “reasonable alternatives” using a suite of Sustainability Objectives and Issues (see Appendix One of this Sustainability Report). Table 6.4 of the *Interim SA* sets out the reasonable alternatives considered and this includes further development at North Weald Bassett (identified in the *Interim SA* Report as Option 3, which is different from Scenario B, Option 3 set out in the *North Weald Bassett Masterplanning Study*, prepared for EFDC in 2014).

In assessing higher growth at North Weald Bassett, the Council’s *Interim SA* assumes a corresponding lower level of growth in other areas of the District. Page 22 of the *Interim SA* also confirms that for the further development at North Weald Bassett option the “level of growth [at North Weald Bassett] and the precise areas it would be diverted from are not known at this stage”. It is considered that this fundamentally restricts the ability of the *Interim SA* to fully appraise the option of higher growth at North Weald Bassett against the settlement housing allocations set out in Draft Local Plan Policy SP2.

The table below extracts the scores for the two pertinent options from Table 7.1 of the *Interim SA*. This suggests that both options are considered identical for ten of the eleven sustainability issues and clearly demonstrates that, by not considering alternative settlement allocations, it has limited the ability of the report to draw specific, meaningful conclusions with regards to the proposed alternative of higher growth at North Weald Bassett. Indeed, in order to fully compare the site allocations in the Draft Local Plan with a higher growth scenario at North Weald Bassett, it is necessary to consider the specific settlements where housing allocations would be redistributed from.

Extract from Table 7.1 of the *Interim SA* Report

Sustainability Issue	Option 1 The [Council's] preferred option	Option 3 Higher growth at North Weald Bassett	Explanation of codification approach [Taken verbatim from Interim SA]
Air quality	=	=	Within each row (i.e. for each of the topics that comprise the SA framework) the columns to the right hand side seek to both categorise the performance of each option in terms of ‘significant effects’ (using red / green) and also rank the alternatives in relative order of performance. Also, ‘ = ’ is used to denote instances where the alternatives perform on a par (i.e. it not possible to differentiate between them). A star is used to highlight the option or options that are preferred from an SA perspective.
Biodiversity and green infrastructure	1 ☆	1 ☆	
Climate change (mitigation & adaptation)	1 ☆	1 ☆	
Community and wellbeing	=	=	
Economy and employment	=	=	
Historic environment	=	=	
Housing	=	=	
Land and waste	2	3	
Landscape	=	=	
Transport	=	=	
Water	=	=	

Source: Aecom (Sept 2016) *Interim SA* Report (pp.20-21)

It is assumed that further development allocations at North Weald Bassett would be chosen from the available and currently unallocated sites assessed in the *Arup Site Selection Report*. Appendix Two of this Sustainability Report compares the corrected OPE site assessment scores with the unallocated sites from North Weald Bassett and shows that the OPE site outperforms the currently unallocated sites using the range of indicators used by EFDC. The OPE site is therefore taken forward to represent the likeliest and most appropriate area for any further growth directed to North Weald Bassett.

In order to assess comparatively the further development at North Weald Bassett option, a redistribution of housing allocations is therefore required from the Draft Local Plan Policy SP2. Using the settlement hierarchy presented in Figure 5.1 of the Draft Local Plan, EFDC designates North Weald Bassett as a large village. Furthermore, the housing allocations presented in Draft Policy SP2 show that several settlements, which are lower in the settlement hierarchy and classified as small villages, have been incorporated in the housing allocations of Draft Policy SP2. These settlements include Coopersale, Fyfield, High Ongar, Lower Sheering, Roydon and Stabbleford Abbots and represent a total allocation of 230 homes. Locating new developments of this scale in smaller villages is not considered a sustainable approach to development and is not consistent with the principles of the *National Planning Policy Framework* or the sequential approach to site allocation detailed in the Draft Local Plan Paragraph 3.54, confirming development in smaller rural communities as the lowest priority.

Assessing further development at North Weald Bassett

It has been shown that the *Interim SA* did not consider specific approaches to redistribution of housing allocations in the option for further development at North Weald Bassett. The following section considers further development at North Weald Bassett by redistributing allocations from smaller settlements to development at the OPE site, in order to appraise whether it is a more sustainable approach to housing allocations than those currently proposed by the Draft Local Plan Policy SP2.

Air quality

The *Interim SA* confirms an equal rating for each option and confirms that at this stage it is difficult to differentiate between the alternatives in terms of air quality. **Hillbreak considers that development of the OPE would have a less detrimental effect on air quality** because it would bring people closer to the local services and facilities of North Weald Bassett, compared to distributing housing across a number of smaller settlements where services and facilities are far more limited. The need to travel, especially by car, would therefore be much reduced meaning that local air quality impacts would be less. Indeed, the *Epping Forest District Local Plan Highway Impact Assessment, Technical Note 7 - Sustainable Accessibility Ranking, Mapping and Analysis*, provided as part of the Draft Local Plan consultation, ranks the various settlements by 'sustainable accessibility'. It provides a weighted comparison of the settlements with respect to public transport access, town centre access, GP surgery access, education access, cycle route access and overall traffic impact. Figure 1 of the Technical Note demonstrates that **Fyfield, Stapleford Abbots, Roydon, Nazeing and Waltham Abbey are assessed as having less sustainable accessibility than North Weald Bassett**. This equates to an allocation of 1,160 dwellings in locations with less sustainable accessibility and indicates **the Draft Policy SP2 allocations will therefore have more car dependency and transport related emissions than the alternative option of further development at North Weald Bassett**.

Biodiversity and green infrastructure

The *Interim SA* assesses the housing allocation of the Draft Local Plan and further development at North Weald Bassett as both ranked 1, with a star to indicate a preferred option. There are, however, sites incorporated in the Draft Local Plan housing allocations that would adversely impact on biodiversity according to the *Arup Site Selection Report Appendix B1.4.2*. For example, both sites allocated at Coopersale (SR-0404 and SR-0405) are identified in Appendix B1.4.2 as impacting Nationally Protected sites and resulting in the loss of or harm to Ancient Woodland.

The corrected site selection scores for OPE summarised in the *Environmental Issues Report*, prepared by Liz Lake Associates and submitted as part of the Peer Group Regulation 19 response, shows that **the OPE development would not impact on Nationally Protected sites or result in the loss or harm to Ancient Woodland**. Furthermore the Landscape and Biodiversity Plan (see Figure 11 in the *Environmental Issues Report* prepared by Liz Lake Associates) confirms the potential opportunity to enhance public access and rights of way in the wider OPE site and to deliver associated enhancements to biodiversity. It is therefore clear that **redistributing allocations from the smaller settlements to further development at North Weald Bassett by maximising the OPE opportunity would, in relation to biodiversity and green infrastructure, be a more sustainable alternative to the currently proposed allocation distribution** in the Draft Local Plan Policy SP2.

Climate Change (mitigation and adaptation)

The *Interim SA* assesses the housing allocation of the Draft Local Plan and further development at North Weald Bassett as both ranked 1, with a star to indicate a preferred option.

Flood risk is a key issue for the site selection process and the OPE site is located in an area of low flood risk. It is clear that a larger site such as the OPE could provide more space for climate adaptation measures, such as SUDS, which might not be possible in smaller sites; this would benefit wider drainage networks which may experience greater pressure under future climate scenarios.

As noted above, the *Epping Forest District Local Plan Highway Impact Assessment* demonstrates that **Fyfield, Stapleford Abbots, Roydon, Nazeing and Waltham Abbey have weaker sustainable accessibility credentials than North Weald Bassett**. **Draft Policy SP2 allocations will therefore have more car dependency and transport related CO₂ emissions than the alternative option of further development at North Weald Bassett**.

Within North Weald Bassett, it is noted that the OPE site runs parallel to High Road providing good access to the bus stops serving the settlement. It is therefore considered that further development at those sites with good access to public transport

along High Road in North Weald Bassett by redistributing allocations from the smaller villages would improve on the currently proposed allocation distribution in the Draft Local Plan Policy SP2.

Community and wellbeing

The *Interim SA* concludes that all options have the potential for a significant long-term positive effect through the provision of housing and associated improvements to infrastructure, including community facilities, services and public transport. However, the *Interim SA* notes that when the options are compared against each other that it is dependent on where growth is being directed. **The *Interim SA* assesses the housing allocation of the Draft Local Plan and further development at North Weald Bassett as being equal in terms of community and wellbeing.**

Figure 1 of the *EFDC Local Plan Highway Impact Assessment* demonstrates that Fyfield, Stapleford Abbots, Roydon, Nazeing and Waltham Abbey are assessed as having weaker accessibility credentials from a sustainability perspective than North Weald. This ranking assessment incorporates weighted scoring for access to community infrastructure such as GP surgeries. **North Weald Bassett provides easy local access to a range of community infrastructure as set out in the *Allies & Morrison North Weald Bassett Masterplanning Study*, and includes the provision of a GP surgery.**

Furthermore the Landscape and Biodiversity Plan (Figure 11 of the *Environmental Issues Report* prepared by Liz Lake Associates) confirms the potential opportunity to enhance public access to the wider OPE site, thereby enhancing amenity value and public health benefits.

It is therefore considered that **further development at North Weald Bassett, by redistributing allocations from the smaller villages, would improve on the currently proposed allocation distribution** in the Draft Local Plan Policy SP2.

Economy and employment

The *Interim SA* records that **North Weald Bassett is one of five main employment sites within the District.** Despite recognising this, the *Interim SA* finds that the Draft Policy SP2 allocations at smaller villages and the further development at North Weald Bassett are still considered equally sustainable in terms of economy and employment.

By comparing the site allocation plans in the Draft Local Plan for the smaller villages of Roydon (Figure 5.18), Nazeing (Figure 5.19), Coopersale (Figure 5.22), Fyfield (Figure 5.2), Lower Sheering (Figure 5.25) and Stapleford Abbots (Figure 5.28) with North Weald Bassett (Figure 5.15), it can be seen that **North Weald Bassett has a larger existing and planned local employment base.** It is also noted that **the OPE site specifically includes potential for business / commercial units which will extend the existing offering** on High Road as shown in the OPE North Weald Masterplan. **Further development at North Weald Bassett would therefore represent an improvement on the currently proposed site allocations from an economic perspective.**

Historic environment

The *Interim SA* findings suggest that the Draft Policy SP2 allocations and further development at North Weald Bassett are considered equally sustainable in terms of historic environment. The *Environmental Issues Report* prepared by Liz Lake Associates shows that the OPE development may improve settlement character through redevelopment of a run down site or improvement in townscape. The *Arup Site Selection Report* (Appendix B1.4.2) confirms that the development sites at the smaller villages of Coopersale (SR-0405), Fyfield (SR-0049), and Lower Sheering (SR-0032) are sites that fall within areas of medium landscape sensitivity. **Redistributing site allocations from the smaller villages to allow further development at North Weald Bassett is therefore a more beneficial option from a settlement character perspective.**

Housing

This topic depends on the specific proposals at each site and therefore cannot be fully assessed at this stage. The options are therefore considered by the *Interim SA* to be equal until further information is available. Hillbreak agrees with this stance.

Land and Waste

The *Interim SA* assesses the housing allocation of the Draft Local Plan as ranked second out of the five options considered and further development at North Weald Bassett as ranked third for land and waste sustainability.

The *Environmental Issues Report* by Liz Lake Associates confirms that the site is non-agricultural. This contradicts the **incorrect assertion in the Arup Site Selection Report that development of the OPE would lead to the loss of agricultural land of the highest quality classification.**

The *Arup Site Selection Report* (Appendix B1.4.2) confirms that the allocated sites at the smaller villages of Coopersale (SR-0404), Fyfield (SR-0049), High Ongar (SR-181), Lower Sheering (SR-0032), Roydon (SR-0890, SR-0169, SR-0035, SR-0197) and Stapleford Abbots (SR-0873) would involve the loss of the best and most versatile agricultural land (grades 1-3). **It is therefore clear that further development at North Weald Bassett, by redistributing allocations from the smaller villages, would be favourable from the point of view of safeguarding agricultural land.**

From a waste perspective, concentrating further development at North Weald Bassett, as opposed to distributed approach across the smaller villages, affords the opportunity to effectively manage both construction materials and domestic waste more efficiently.

Landscape

The *Interim SA* assesses the housing allocation of the Draft Local Plan and further development at North Weald Bassett as equal in terms of landscape sustainability.

Using the *Arup Site Selection Report* classification, the Liz Lake Associates' *Environmental Issues Report* confirms that the site falls within an area of low landscape sensitivity. The *Arup Site Selection Report* (Appendix B1.4.2) confirms that the development sites at the smaller villages of Coopersale (SR-0404, SR-0405), Fyfield (SR-0049), Roydon (SR-0890, SR-0169, SR-0035) are within areas of high landscape sensitivity and unable to absorb development without significant character change. The *Arup Site Selection Report* also confirms that the development site at Lower Sheering (SR-0032) is within an area of medium landscape sensitivity. It is therefore clear that **further development at North Weald Bassett would lead to considerably lower landscape impacts than the currently proposed site allocations in the Draft Local Plan Policy SP2.**

Transport

The *Interim SA* assesses the housing allocation of the Draft Local Plan and further development at North Weald Bassett as equal in terms of transport. However the *Epping Forest District Local Plan Highway Impact Assessment* confirms that **Fyfield, Stapleford Abbots, Roydon, Nazeing and Waltham Abbey, which are included in the Draft Policy SP2 allocations, have weaker sustainable accessibility credentials than North Weald Bassett.** Further development at North Weald Bassett, by redistributing allocations from the smaller villages, would therefore represent a more sustainable approach to development allocations than those currently proposed in the Draft Local Plan Policy SP2.

Water

The *Interim SA* assesses the housing allocation of the Draft Local Plan and further development at North Weald Bassett as equal in terms of water. This sustainability topic depends on the specific housing proposals at each site in order to consider minimising water usage, improve water quality in line with legislative requirements and access to areas with sewerage infrastructure. Therefore, the options are considered equal in the *Interim SA* until further information is available. Hillbreak agrees with this stance.

Summary

This section presents a summary of the comparison between the preferred option (as defined in the Draft Local Plan) and higher growth at North Weald Bassett. It shows that **when allocated sites are redistributed from the smaller villages to North Weald Bassett it results in better sustainability outcomes with respect to nine of the eleven Interim SA topics, with the remaining two being of equal measure. Further development at North Weald Bassett is therefore considered a materially more positive approach to allocations with respect to the sustainability topics identified in the Interim SA, and is therefore an approach that would be more consistent with the presumption in favour of sustainable development enshrined in the NPPF.**

Arup Site Selection Report and the relative sustainability effects of different site allocation options

Background

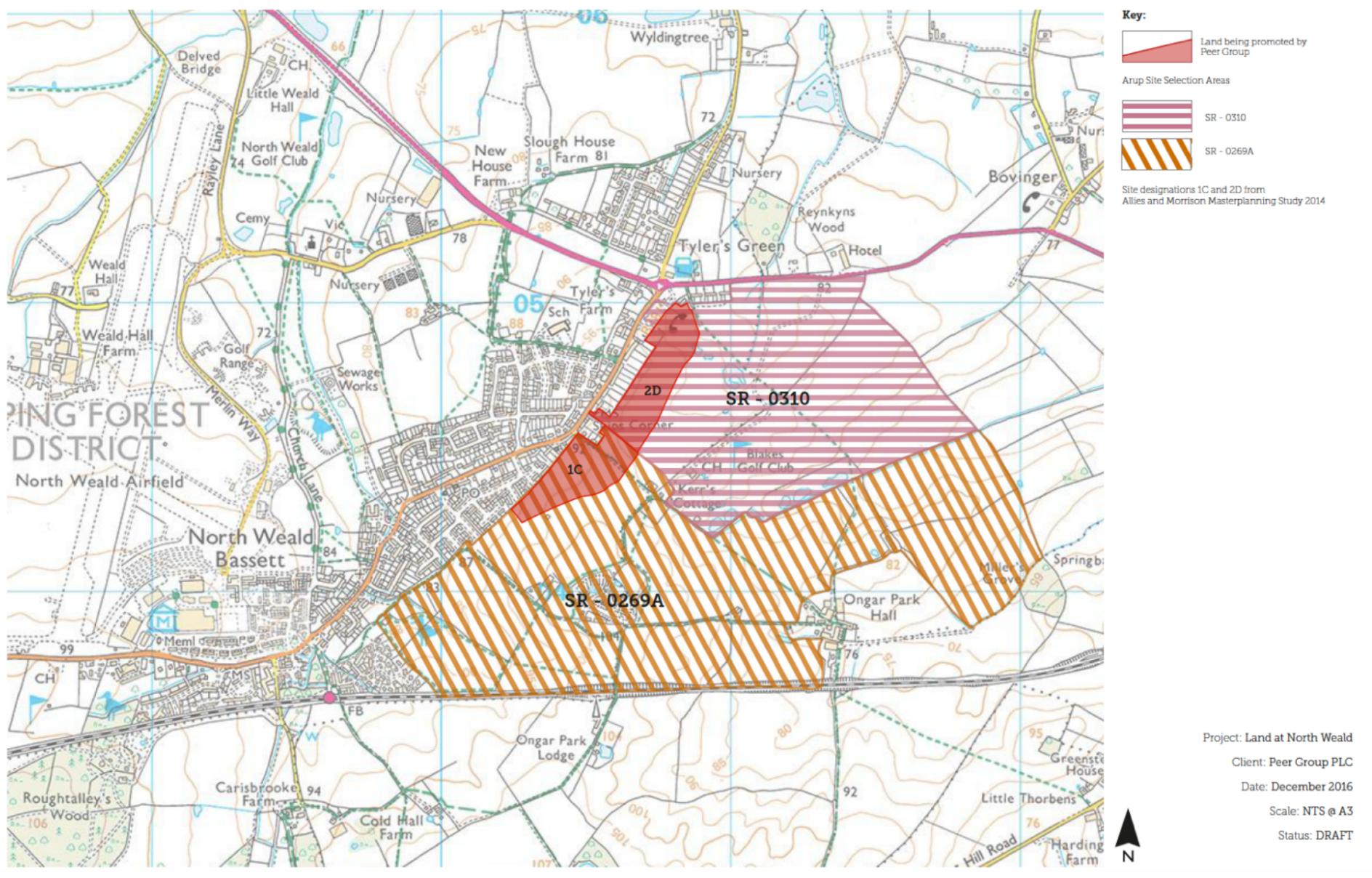
As part of the process for developing the Draft Local Plan, Epping Forest District Council commissioned the *Arup Site Selection Report, September 2016* to guide decisions on site allocations across the district. The report is listed as Key Evidence in the Draft Local Plan (paragraph 5.10) and has been instrumental in informing the identification of specific sites to deliver the housing allocations set out in Draft Local Plan Policy SP2 for the Epping Forest District outside of Harlow.

However, in the case of OPE at North Weald Bassett, the *Arup Site Selection Report* assesses a total area of land of 190 hectares and assumes development potential for 6,018 homes across two parcels of land: SR-0269A and SR-0310. This is vastly greater than the 15.26 hectares and 280 homes that has been proposed for development on the OPE by Peer Group plc and that was previously proposed in *Allies & Morrison's North Weald Masterplanning Study* from 2014. The figure below, extracted from the Liz Lake Associates' *Environmental Issues Report*, clearly illustrates the differences in size between the relevant proposed OPE development area in *Allies & Morrison's North Weald Masterplanning Study in 2014* and what has been assessed in the *Arup Site Selection Report* in 2016. **The OPE opportunity at North Weald Bassett has therefore been wrongly assessed by the Arup Site Selection Report which has led to the site being materially misrepresented in the site allocation process for the Draft Local Plan.**

LIZ LAKE ASSOCIATES
LANDSCAPE ARCHITECTS

office@lizlake.com www.lizlake.com

1882 Figure 10
Promoted Site/Arup Site Comparison



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The following pages of this Sustainability Report use the correct OPE development site area from the Allies & Morrison *North Weald Masterplanning Study* to reassess SR-0269A and SR-0310 against the same 32 indicators used in the *Arup Site Selection Report*. The tables on pages 11 and 15 present the original judgements made in the *Arup Site Selection Report* based on the inaccurate site area, alongside those of Hillbreak for the correct development site. Any variations in the judgement of Hillbreak from those presented in the *Arup Site Selection Report* are explained and justified in the corresponding narrative on pages 12-14 and 16-18.

The table below presents the codification system used for the 32 indicators in line with the original *Arup Site Selection Report* and detailed further in Appendix B1.4.1 (of the *Arup Site Selection Report*).

Codification	Likely Effect	Applicable Indicators
(++)	Significant positive effect likely	Indicators 1.7, 1.8a, 2.1, and 4.1 only
(+)	Minor positive effect likely	Indicators 1.1, 1.4, 1.5, 1.7, 1.8a, 1.8b, 2.1, 3.1 to 3.8, 4.1, 4.3, 5.2 and 6.4 only
0	Negligible effect likely	All indicators
(-)	Minor negative effect likely	All indicators
(--)	Significant negative effect likely	All indicators except Indicators 3.1 to 3.7
N/A	Not applicable	Indicator 3.8

Arup Site Selection Report assessment for SR-0269A and updated with correct area from Allies & Morrison North West Bassett Masterplanning Study site area (A&M 1C)

	Criteria	SR-0269A	A&M 1C	Hillbreak Notes on Discrepancies
1.1	Impact on Internationally Protected Sites	0	0	
1.2	Impact on Nationally Protected sites	0	0	
1.3a	Impact on Ancient Woodland	0	0	
1.3b	Impact on Ancient/Veteran Trees	0	0	
1.4	Impact on Epping Forest Buffer Land	0	0	
1.5	Impact on BAP Priority Species or Habitats	(- -)	(-)	Revised score detailed in Environmental Issues Report
1.6	Impact on Local Wildlife Sites	(-)	(+)	Revised score detailed in Environmental Issues Report
1.7	Flood risk	(++)	(++)	
1.8a	Impact on heritage assets	(-)	0	Revised score detailed in Heritage Assessment report
1.8b	Impact on archaeology	(-)	0	The site has not been identified to include finds of archaeological significance.
1.9	Impact of air quality	0	0	
2.1	Level of harm to Green Belt	(-)	(-)	
3.1	Distance to the nearest rail/tube station	(-)	(-)	
3.2	Distance to nearest bus stop	0	(+)	Site is within 400m of bus stop on High Road
3.3	Distance to employment locations	(+)	(+)	
3.4	Distance to local amenities	0	(+)	Site is less than 1000m from nearest large village
3.5	Distance to nearest infant/primary school	0	(+)	Site is within 1000m of St Andrews Primary School
3.6	Distance to nearest secondary school	(-)	(-)	
3.7	Distance to nearest GP surgery	0	(+)	Site is within 1000m of North Weald GP surgery
3.8	Access to Strategic Road Network	N/A	N/A	
4.1	Brownfield and Greenfield Land	(-)	(-)	
4.2	Impact on agricultural land	(- -)	0	Revised score detailed in Environmental Issues Report
4.3	Capacity to improve access to open space	(- -)	(+)	Revised score detailed in Environmental Issues Report
5.1	Landscape sensitivity	(- -)	0	Revised score detailed in Environmental Issues Report
5.2	Settlement character sensitivity	(-)	(+)	Revised score detailed in Environmental Issues Report
6.1	Topography constraints	(-)	0	Revised score detailed in Environmental Issues Report
6.2a	Distance to gas and oil pipelines	0	0	
6.2b	Distance to power lines	0	0	
6.3	Impact on Tree Preservation Order (TPO)	0	0	
6.4	Access to site	(+)	(+)	
6.5	Contamination constraints	(-)	(-)	
6.6	Traffic impact	0	0	

Discussion and justification of corrected site selection scores for the OPE development

Impact on BAP Priority Species or Habitats (Indicator 1.5)

In the assessment of the larger SR-0269A site in the *Arup Site Selection Report*, the presence of Wood Pasture and Parkland Habitat and Biodiversity Action Plan habitats is indicated, resulting in a significant negative effect that cannot be mitigated being ascribed. However, the *Environmental Issues Report* prepared by Liz Lake Associates confirms that the site area proposed for development in the *Allies & Morrison North Weald Bassett Masterplanning Study* records a minor negative impact where features and species in the Site may not be retained in their entirety but effects can be mitigated.

Impact on Local Wildlife Sites (Indicator 1.6)

The *Arup Site Selection Report* assessment of the larger SR-0269A site records the presence of Local Wildlife Sites, which results in a significant negative effect being ascribed. However, the Liz Lake Associates' *Environmental Issues Report* confirms that the proposed site for development does not contain Local Wildlife Sites. The *Environmental Issues Report* also references opportunities to enhance existing features and therefore concludes that a positive effect is likely.

Impact on heritage assets (Indicator 1.8a)

In the assessment of the larger SR-0269A site in the *Arup Site Selection Report*, a minor negative effect is recorded with the Site deemed to be located within a Conservation Area or adjacent to a Listed Building or other heritage asset. *The North Weald Redoubt: Heritage Assessment*, carried out by Peter Stewart Consultancy, and submitted as part of the Regulation 18 representations for the OPE site, confirms that a negligible impact score is more appropriate for the OPE site. Furthermore, the *North Weald Site Appraisal, 2016* prepared by Omega Partnership provides the masterplan for the OPE site and confirms that the buffer surrounding Ongar Redoubt proposed in the *Allies & Morrison North Weald Bassett Masterplanning Study (page 118)* commissioned by EDFC has been incorporated in the development proposals.

Impact on archaeology (Indicator 1.8b)

The *Arup Site Selection Report* assessment of the larger SR-0269A site records a minor negative effect as being likely, suggesting that existing evidence and/or a lack of previous disturbance indicates a high likelihood for the discovery of high quality archaeological assets on the site. The *Land at Ongar Park Report, 2012* carried out by Capita Symonds considers a wider area of land than is proposed for development at OPE but confirms that the extent of the area proposed for development has not been identified to include finds of archaeological significance. It is therefore more appropriate to ascribe a negligible effect taking account of the fact that there is considered to be medium likelihood that further archaeological assets may be discovered on site.

Distance to nearest bus stop (Indicator 3.2)

The *Arup Site Selection Report* assessment of the larger SR-0269A site records that the walking distance to the local bus stop for the larger site is between 400m and 1000m. However, the site proposed for development at OPE is within 400m of numerous bus stops along High Road. This corresponds to a more positive rating, and the corrected judgement for the proposed development site should therefore be a minor positive effect.

Distance to local amenities (Indicator 3.4)

The *Arup Site Selection Report* assessment of the SR-0269A site records that the site is between 1000m and 4000m from the nearest town, large village or small village. However, the Liz Lake Associates' *Environmental Issues Report* confirms the proposed development area is a narrow strip that runs parallel to High Road in North Weald. The proposed development is clearly within 1000m of North Weald and therefore corresponds with at least a minor positive effect.

Distance to nearest infant / primary school (Indicator 3.5)

The *Arup Site Selection Report* assessment of the larger SR-0269A site records that the site is between 1000m and 4000m from the nearest infant / primary school. However, the OPE is entirely within 1000m of St Andrews Primary School justifying a correction to the appraisal with a minor positive effect being ascribed.

Distance to nearest GP surgery (Indicator 3.7)

The *Arup Site Selection Report* assessment of the larger SR-0269A site records that the site is between 1000m and 4000m from the nearest GP surgery. However, the area being developed is within 1000m of North Weald GP Surgery and therefore corresponds with a corrected judgement of a minor positive effect being likely.

Impact on agricultural land (Indicator 4.2)

The *Arup Site Selection Report* assessment of the larger SR-0269A site suggests that the larger site would result in the loss of best and most versatile agricultural land (grades 1-3). However, the Liz Lake Associates' *Environmental Issues Report* confirms that the presented site for development is on non-agricultural land. Development of the site would not result in the loss of any agricultural land and the *Environmental Issues Report* concludes that a negligible effect would be likely.

Capacity to improve access to open space (Indicator 4.3)

As stated earlier, the *Arup Site Selection Report* assessment of SR-0269A assumes that the larger site will be developed for 3,950 dwellings and 130,000 sq m of commercial space. This incorrect and unrepresentative assumption has led to a major negative effect being considered likely, suggesting a loss of public open space with no opportunities for on-site off-setting or mitigation. However the OPE is private owned with access currently restricted to public rights of way. Furthermore, the Landscape and Biodiversity Plan (Figure 11 of the *Environmental Issues Report* prepared by Liz Lake Associates) confirms the potential opportunity to enhance public access to the wider OPE site. The *Environmental Issues Report* therefore confirms that development of the OPE site is likely to give rise to a positive effect.

Landscape sensitivity (Indicator 5.1)

The assessment of the larger SR-0269A site in the *Arup Site Selection Report* asserts that the site falls within an area of high landscape sensitivity. It concludes that a major negative effect is likely but provides no justification of the score given. The Liz Lake Associates' *Environmental Issues Report* provides full assessment of the actual site proposed for development, confirming that it falls within an area of low landscape sensitivity, concluding that a negligible effect is likely.

Settlement character sensitivity (Indicator 5.2)

The *Arup Site Selection Report* assessment of SR-0269A suggests that the larger site could detract from the existing settlement character due to the views of North Weald from the Chipping Ongar Redoubt Monument. The *Environmental Issues Report* by Liz Lake Associates provides full assessment of the actual site proposed for development, confirming that it is unlikely to have anything other than a positive effect on settlement character.

Topography constraints (Indicator 6.1)

The *Arup Site Selection Report* suggests that topographical constraints exist with the SR-0269A site and that a minor negative effect would likely result from development. Figure 6 of the *Environmental Issues Report* by Liz Lake Associates confirms that the OPE site proposed for development is located away from the closer contours of the Ongar Redoubt. The Liz Lake Associates' *Environmental Issues Report* presented as part of the Regulation 19 representations provides full assessment of the actual site proposed for development, confirming that the site has a mean gradient of no more than 1:49 at its steepest point and no topographical constraints exist.

Summary

The Draft Local Plan has used the *Arup Site Selection Report, 2016* as part of the key evidence in the EFDC site allocations. However the *Arup Site Selection Report* has assessed significantly larger site areas, making incorrect assumptions of vastly greater numbers of dwellings and commercial space than has been proposed for development by either the Peer Group plc or Allies & Morrison *North Weald Bassett Masterplanning Study* from 2014. These assumptions have led to an erroneous assessment of sustainability effects that are not related to the actual area of development opportunity, making the *Arup Site Selection Report* unsound. This comparison of the SR-0269A site used in the *Arup Site Selection Report* with the correct area presented in the Allies & Morrison *North Weald Bassett Masterplanning Study*, shows that 13 (thirteen) of the 32 indicators are not considered representative of the site actually proposed, with many achieving significantly more positive scores.

Arup Site Selection Report assessment for SR-0310 and updated for correct area for Allies & Morrison North West Bassett Masterplanning Study site area (A&M 2D)

	Criteria	SR-0310	A&M 2D	Hillbreak Notes on Discrepancies
1.1	Impact on Internationally Protected Sites	0	0	
1.2	Impact on Nationally Protected sites	0	0	
1.3a	Impact on Ancient Woodland	(-)	0	Revised score detailed in Environmental Issues Report
1.3b	Impact on Ancient/Veteran Trees	0	0	
1.4	Impact on Epping Forest Buffer Land	0	0	
1.5	Impact on BAP Priority Species or Habitats	(-)	(-)	
1.6	Impact on Local Wildlife Sites	0	0	
1.7	Flood risk	(++)	(++)	
1.8a	Impact on heritage assets	0	0	
1.8b	Impact on archaeology	(-)	0	The site has not been identified to include finds of archaeological significance.
1.9	Impact of air quality	(-)	(-)	
2.1	Level of harm to Green Belt	(-)	(-)	
3.1	Distance to the nearest rail/tube station	(-)	(-)	
3.2	Distance to nearest bus stop	0	(+)	Site is less than 400m from a bus stop
3.3	Distance to employment locations	(+)	(+)	
3.4	Distance to local amenities	0	(+)	Site is less than 1000m from nearest large village
3.5	Distance to nearest infant/primary school	0	(+)	Site is within 1000m of St Andrews Primary School
3.6	Distance to nearest secondary school	(-)	(-)	
3.7	Distance to nearest GP surgery	0	0	
3.8	Access to Strategic Road Network	N/A	N/A	
4.1	Brownfield and Greenfield Land	(-)	(-)	
4.2	Impact on agricultural land	(--)	0	Revised score detailed in Environmental Issues Report
4.3	Capacity to improve access to open space	0	(+)	Revised score detailed in Environmental Issues Report
5.1	Landscape sensitivity	(--)	0	Revised score detailed in Environmental Issues Report
5.2	Settlement character sensitivity	(-)	(+)	Revised score detailed in Environmental Issues Report
6.1	Topography constraints	(-)	0	Revised score detailed in Environmental Issues Report
6.2a	Distance to gas and oil pipelines	0	0	
6.2b	Distance to power lines	0	0	
6.3	Impact on Tree Preservation Order (TPO)	0	0	
6.4	Access to site	(+)	(+)	
6.5	Contamination constraints	(-)	(-)	
6.6	Traffic impact	(-)	(-)	

Discussion and justification of corrected site selection scores for the OPE development

Impact on Ancient Woodland (Indicator 1.3a)

The *Arup Site Selection Report* assessment of the larger SR-0310 site records the presence of Reynkyns Wood Ancient Woodland within 250m of the site, and concludes as a result that a minor negative effect is likely. As the suggested features are not present on the proposed development site the *Environmental Issues Report* by Liz Lake Associates concludes that the effect would be negligible.

Impact on archaeology (Indicator 1.8b)

The *Arup Site Selection Report* assessment of the larger SR-0310 site indicates that a minor negative effect is likely, suggesting that existing evidence and/or a lack of previous disturbance indicates a high likelihood for the discovery of high quality archaeological assets on the site. The *Land at Ongar Park Report, 2012* carried out by Capita Symonds considers a wider area of land than is proposed for development at OPE but confirms that the extent of the area proposed for development has not been identified to include finds of archaeological significance. It is therefore more appropriate (and indeed, it could be considered conservative) to ascribe a negligible effect taking account of the fact that there is considered to be medium likelihood that further archaeological assets may be discovered on site.

Distance to nearest bus stop (Indicator 3.2)

The *Arup Site Selection Report* assessment of the larger SR-0310 site records that the site is between 400m and 1000m of a bus stop. However, the site proposed for development at OPE is within 400m of numerous bus stops along High Road. This corresponds to a more positive rating, and the corrected judgement for the proposed development site should therefore be a minor positive effect.

Distance to local amenities (Indicator 3.4)

The *Arup Site Selection Report* assessment of the SR-0310 site records that the site is between 1000m and 4000m from nearest town, large village or small village. However, the Liz Lake Associates' *Environmental Issues Report* confirms the proposed development area is a narrow strip that runs parallel to High Road in North Weald. The proposed development is clearly within 1000m of North Weald and therefore corresponds with at least a minor positive effect.

Distance to nearest infant / primary school (Indicator 3.5)

The *Arup Site Selection Report* assessment of SR-0310 records that the site is between 1000m and 4000m from the nearest infant / primary school. However, the OPE is entirely within 1000m of St Andrews Primary School justifying a correction to the appraisal with a minor positive effect being ascribed.

Impact on agricultural land (Indicator 4.2)

The *Arup Site Selection Report* assessment of SR-0310 suggests that the larger site would result in the loss of best and most versatile agricultural land (grades 1-3). However, the *Environmental Issues Report* by Liz Lake Associates confirms that the presented site for development is on non-agricultural land. Development of the site would not result in the loss of any agricultural land and the *Environmental Issues Report* concludes that a negligible effect would be likely according to the classification system, although the reality is that there would be no effect.

Capacity to improve access to open space (Indicator 4.3)

As stated earlier, the *Arup Site Selection Report* assessment of SR-0310 assumes that the larger site will be developed for 3,950 dwellings and 130,000 sq m of commercial space. This assumption has led to a major negative effect being considered likely, suggesting a loss of public open space with no opportunities for on-site off-setting or mitigation. Furthermore the Landscape and Biodiversity Plan (Figure 11 of the *Environmental Issues Report* prepared by Liz Lake Associates) confirms the potential opportunity to enhance public access to the wider OPE site. The *Environmental Issues Report* therefore confirms that development of the OPE site is likely to give rise to a minor positive effect.

Landscape sensitivity (Indicator 5.1)

The larger SR-0310 site assessed in the *Arup Site Selection Report* scores the site as falling within an area of high landscape sensitivity and major negative effect, with no justification of the score given. The Liz Lake Associates' *Environmental Issues Report* provides full assessment of the actual site proposed for development, confirming that it falls within an area of medium landscape sensitivity and as such indicates the likelihood of a negligible effect.

Settlement character sensitivity (Indicator 5.2)

The *Arup Site Selection Report* assessment of SR-0310 suggests that the larger site could detract from the existing settlement character due to the views of North Weald from the Chipping Ongar Redoubt Monument. The Liz Lake Associates' *Environmental Issues Report* provides full assessment of the actual site proposed for development, confirming that it is likely to have a minor positive effect on settlement character.

Topography constraints (Indicator 6.1)

The *Arup Site Selection Report* suggests that topographical constraints are contained within the SR-0310 site and that a minor negative effect would likely result from development. The *Environmental Issues Report* by Liz Lake Associates confirms that the actual site OPE site proposed for development is located away from the closer contours of the Ongar Redoubt and provides full assessment of the actual site proposed for development, confirming that the site has a mean gradient of no more than 1:49 at its steepest point and no topographical constraints exist.

Summary

The Draft Local Plan has used the *Arup Site Selection Report, 2016* as part of the key evidence in the EFDC site allocations. However the *Arup Site Selection Report* has assessed significantly larger site areas, making incorrect assumptions of vastly greater numbers of dwellings and commercial space than has been proposed for development by either the Peer Group plc or Allies & Morrison's *North Weald Bassett Masterplanning Study* from 2014. These assumptions have led to an erroneous assessment of sustainability effects that are not related to the actual area of development opportunity, making the *Arup Site Selection Report* unsound. This comparison of the SR-0310 site used in the *Arup Site Selection Report* with the correct area presented in the Allies & Morrison's *North Weald Bassett Masterplanning Study*, shows that 10 (ten) of the 32 indicators are not considered representative of the site actually proposed, with many achieving significantly more positive scores.

Comparison Summary and Consolidated Scores

Summary of comparison between Site Selection Report assessed sites and the correct OPE development area

The Draft Local Plan has used the *Arup Site Selection Report, 2016* as key evidence in the EFDC site allocations. However, the *Arup Site Selection Report* has assessed significantly larger site areas, making incorrect assumptions of vastly greater numbers of dwellings than have been presented for development by Peer Group plc and the Council's own *North Weald Bassett Masterplanning Study* from 2014.

The previous pages have shown that if the correct OPE site area had been used, then the scoring for the Allies & Morrison Masterplan 1C site would have been considerably more positive with 13 of the 32 indicators used in the *Arup Site Selection Report* changing. Furthermore, for the Allies & Morrison Masterplan 2D site the scoring would have been more positive in 10 of the 32 indicators. For some of the sustainability issues identified in the *Arup Site Selection Report*, the effects are significantly more positive when the correct OPE development opportunity is assessed. This is due to the incomparable difference in size of the sites assessed, the fact that the level of development proposed for OPE is completely different to that assumed in the *Arup Site Selection Report*, and the potential of the private-owned wider OPE to deliver positive enhancements to open space access, wildlife, ecology are ignored, as indicated by Figure 11 of the *Environmental Issues Report* submitted as part of the Regulation 19 representations for OPE.

With respect to the OPE site, the site allocations of the Local Plan have therefore been guided by Site Selection scores that are materially incorrect and has therefore misrepresented the OPE site in the site allocation process of the Draft Local Plan.

Consolidated score for the presented OPE site

The previous section showed that if the correct development area and associated proposals from Peer Group plc had been used in the *Arup Site Selection Report*, then the scoring results would have been materially different. The OPE site is promoted by Peer Group plc for development as a single site with an integrated masterplanning approach. Accordingly, the two sets of corrected scores (for A&M 1C and A&M 2D) in the previous section have been consolidated into a single score set representative of the whole OPE development opportunity, as shown in the following figure.

Final corrected site selection scores consolidated into a single score for the OPE development

Criteria	A&M 1C	A&M 2D	OPE site
1.1	Impact on Internationally Protected Sites	0	0
1.2	Impact on Nationally Protected sites	0	0
1.3a	Impact on Ancient Woodland	0	0
1.3b	Impact on Ancient/Veteran Trees	0	0
1.4	Impact on Epping Forest Buffer Land	0	0
1.5	Impact on BAP Priority Species or Habitats	(-)	(-)
1.6	Impact on Local Wildlife Sites	(+)	0
1.7	Flood risk	(++)	(++)
1.8a	Impact on heritage assets	0	0
1.8b	Impact on archaeology	0	0
1.9	Impact of air quality	0	(-)
2.1	Level of harm to Green Belt	(-)	(-)
3.1	Distance to the nearest rail/tube station	(-)	(-)
3.2	Distance to nearest bus stop	(+)	(+)
3.3	Distance to employment locations	(+)	(+)
3.4	Distance to local amenities	(+)	(+)
3.5	Distance to nearest infant/primary school	(+)	(+)
3.6	Distance to nearest secondary school	(-)	(-)
3.7	Distance to nearest GP surgery	(+)	0
3.8	Access to Strategic Road Network	Deemed not applicable in the <i>Arup Site Selection Report</i>	
4.1	Brownfield and Greenfield Land	(-)	(-)
4.2	Impact on agricultural land	0	0
4.3	Capacity to improve access to open space	(+)	(+)
5.1	Landscape sensitivity	0	0
5.2	Settlement character sensitivity	(+)	(+)
6.1	Topography constraints	0	0
6.2a	Distance to gas and oil pipelines	0	0
6.2b	Distance to power lines	0	0
6.3	Impact on Tree Preservation Order (TPO)	0	0
6.4	Access to site	(+)	(+)
6.5	Contamination constraints	(-)	(-)
6.6	Traffic impact	0	(-)

Comparison of the Corrected OPE Site Scores with the Draft Local Plan Allocations for North Weald Bassett

The Draft Local Plan presents draft site allocations for North Weald Bassett in Draft Policy P6 as summarised in the table below. The proposed OPE development would provide up to 280 dwellings and the table below highlights in light green rows the allocations that are most comparable in terms of housing capacity to the OPE site.

The table overleaf provides a comparison of the *Arup Site Selection Report* assessments for the highlighted, comparable sites alongside the corrected scores for the OPE site. It is worth stating that the Draft Local Plan provides an allocation of 225 dwellings at the North Weald Airfield (SR-0119), despite no assessment of that site being provided in the the *Arup Site Selection Report*.

Site Reference	Draft Local Plan Description	Approximate Number of Dwellings
SR-0003	Fields east and west of Church Lane, north of Lancaster Road	276
SR-0036	Land at Blumans Farm, west of Tylers Green	288
SR-0072	Land at Tylers Farm, High Road	21
SR-0119	Land at North Weald Airfield	225
SR-0158A	Land south of Vicarage Lane	590
SR-0195B	Land to the north of Vicarage Lane	91
SR-0417	Land east of Church Lane / west of Harrison Drive	49
SR-0455	Chase Farm Business Centre, Vicarage Lane West	27
SR-0512	St Clements, Vicarage Lane West	11

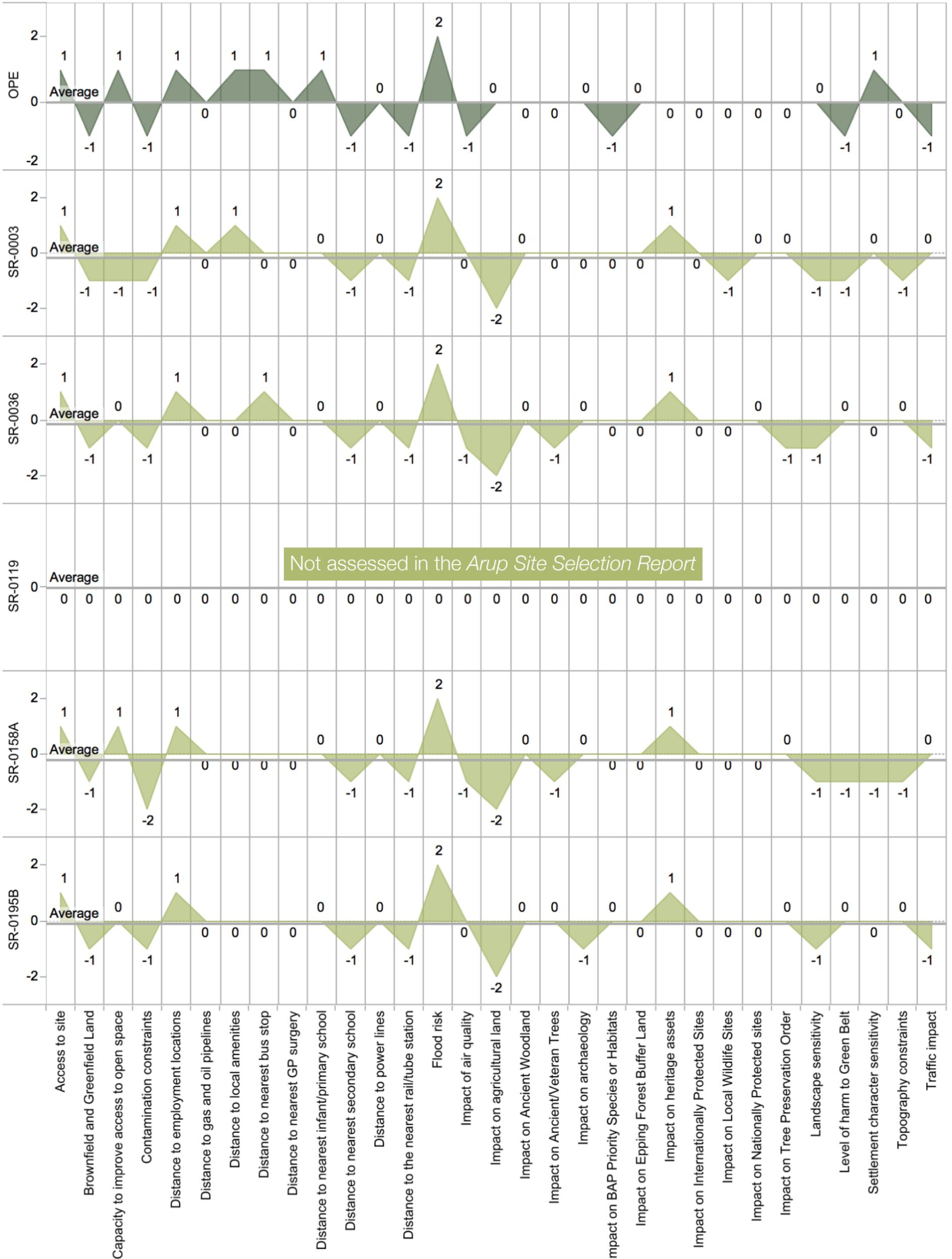
Comparison of selected North Weald Bassett development sites

	Criteria	OPE	SR-0003	SR-0036	SR-0158A	SR-0195B	SR-0119
1.1	Impact on Internationally Protected Sites	0	0	0	0	0	?
1.2	Impact on Nationally Protected sites	0	0	0	0	0	?
1.3a	Impact on Ancient Woodland	0	0	0	0	0	?
1.3b	Impact on Ancient/Veteran Trees	0	0	(-)	(-)	0	?
1.4	Impact on Epping Forest Buffer Land	0	0	0	0	0	?
1.5	Impact on BAP Priority Species or Habitats	(-)	0	0	0	0	?
1.6	Impact on Local Wildlife Sites	0	(-)	0	0	0	?
1.7	Flood risk	(++)	(++)	(++)	(++)	(++)	?
1.8a	Impact on heritage assets	0	(+)	(+)	(+)	(+)	?
1.8b	Impact on archaeology	0	0	0	0	(-)	?
1.9	Impact of air quality	(-)	0	(-)	(-)	0	?
2.1	Level of harm to Green Belt	(-)	(-)	0	(-)	0	?
3.1	Distance to the nearest rail/tube station	(-)	(-)	(-)	(-)	(-)	?
3.2	Distance to nearest bus stop	(+)	0	(+)	0	0	?
3.3	Distance to employment locations	(+)	(+)	(+)	(+)	(+)	?
3.4	Distance to local amenities	(+)	(+)	0	0	0	?
3.5	Distance to nearest infant/primary school	(+)	0	0	0	0	?
3.6	Distance to nearest secondary school	(-)	(-)	(-)	(-)	(-)	?
3.7	Distance to nearest GP surgery	0	0	0	0	0	?
3.8	Access to Strategic Road Network	Deemed not applicable in the <i>Arup Site Selection Report</i>					?
4.1	Brownfield and Greenfield Land	(-)	(-)	(-)	(-)	(-)	?
4.2	Impact on agricultural land	0	(--)	(--)	(--)	(--)	?
4.3	Capacity to improve access to open space	(+)	(-)	0	(+)	0	?
5.1	Landscape sensitivity	0	(-)	(-)	(-)	(-)	?
5.2	Settlement character sensitivity	(+)	0	0	(-)	0	?
6.1	Topography constraints	0	(-)	0	(-)	0	?
6.2a	Distance to gas and oil pipelines	0	0	0	0	0	?
6.2b	Distance to power lines	0	0	0	0	0	?
6.3	Impact on Tree Preservation Order (TPO)	0	0	(-)	0	0	?
6.4	Access to site	(+)	(+)	(+)	(+)	(+)	?
6.5	Contamination constraints	(-)	(-)	(-)	(--)	(-)	?
6.6	Traffic impact	(-)	0	(-)	0	(-)	?

Note: No assessment of SR-0119 is provided in the *Arup Site Selection Report*



OPE Compared with Allocated Sites



Conclusion of OPE comparison with Site Selection Report assessment scores at North Weald Bassett

It has been shown that the *Site Selection Report* carried out by Arup assessed land of 190 hectares and assumed 6,018 homes, which is vastly greater than the 15.26 hectares and 280 homes presented for development by Peer Group plc and incorporated in the *North Weald Bassett Masterplanning Study* prepared by Allies & Morrison in 2014. This Sustainability Report, along with the supporting documents incorporated in the Regulation 18 representations for OPE, has provided further evidence along with corrected site selection scores for the OPE development. The table and graph on the previous pages demonstrate that the OPE development is one of the most consistent and positive performers over the 32 indicators utilised in the site selection process that derived the allocations for North Weald Bassett.

Using the sequential approach to the allocation of sites at each settlement, as set out in the Draft Local Plan Paragraph 3.54, the first priority is to propose land in Flood Zone 2 and 3 only where need cannot be met in Flood Zone 1. It is noted that the Site Selection Report assessment of SR-0003 states that OPE contains Higher Flood Risk Zones 2 and 3a totalling 7% located along the eastern site boundary. However, this is due to the inaccurate site boundary applied to the site selection process; in actual fact all of the OPE site proposed for development falls within Flood Zone 1.

Using a sequential approach to the allocation of sites at each settlement as set out in the Draft Local Plan Paragraph 3.54, there is a stated priority to develop greenfield / green belt land of least value on the edge of settlements. Indicator 2.1 confirms that the OPE development and the allocated sites of SR-0003 and SR-0158B are within greenbelt where the level of harm caused by release of the land for development would be very low, low or medium, and is therefore equal across the sites. The next priority in the sequential process focuses on guiding development away from high grade agricultural land. The Liz Lake Associates' *Environmental Issues Report* confirms that the land presented for development is non-agricultural and therefore development of the land would not result in the loss of agricultural land. However, the sites to the north and west of North Weald Bassett (SR-0003, SR-0036, SR-0158A and SR-195B), all incorporated in the site allocations of Draft Local Plan Policy P6, are correctly recorded in the *Arup Site Selection Report* assessments to involve the loss of best and most versatile agricultural land (grades 1-3). They are also located in areas of open countryside that are deemed to be of high sensitivity, with no capacity to accommodate development without a material change to landscape character. In contrast, the site promoted by Peer Group to the southeast of North Weald Bassett would have no impact and would not cause the loss of any agricultural land and by the sequential process set out in the Draft Local Plan should be considered the priority for housing allocations.

Further to the above comparison of sites, the *Arup Site Selection Report* indicates that SR-0036 and SR-0158A could impact on Ancient trees SR-0003 could impact on the Church Lane Flood Meadow Local Wildlife Site. The corrected site selection scores for the OPE site in the *Environmental Issues Report* prepared by Liz Lake Associates confirms that neither of these impacts are likely to occur for the OPE site. The location of the OPE development running parallel to the main bus route through North Weald Bassett provides comparably better access to sustainable forms of transport, also making it a more sustainable location for development and supporting the Draft Local Plan Policy T1 for Sustainable Transport Choices.

It is also noted in the *Arup Site Selection Report* that SR-0158B is likely to have contamination that is not likely to be mitigated and that a 100m buffer zone from any contamination found during further investigation should be maintained. This may potentially impact on the allocated housing numbers proposed in Draft Local Plan Policy P6.

This Sustainability Report set out to assess:

- whether directing greater levels of housing growth to North Weald Bassett would be consistent with the presumption in favour of sustainable development enshrined in the National Planning Policy Framework;
- whether the part of the OPE that has been proposed by Peer Group plc for housing has been assessed accurately and fairly with respect to its potential contribution to the sustainable development objectives of the District;
- whether the OPE development opportunity would provide a sustainable solution to delivering housing need in the village of North Weald Bassett; and
- by comparison, whether the allocation of sites to the northwest of North Weald Bassett on high quality agricultural land or in close proximity to the active airfield is the most appropriate strategy.

Based on the evidence reviewed, including the *Arup Site Selection Report*, the *Allies & Morrison North Weald Bassett Masterplanning Study* and the key policies identified by Epping Forest District Council in the process of developing the Draft Local Plan and its related *Interim Sustainability Appraisal*, it is concluded that:

- North Weald Bassett is a well-established and inherently sustainable location for well planned development, with many attributes to support a sustainable community. The *Epping Forest District Local Plan Highway Impact Assessment, Technical Note 7 - Sustainable Accessibility Ranking, Mapping and Analysis*, provided as part of the Draft Local Plan consultation, demonstrates that North Weald Bassett has stronger accessibility credentials from a sustainability perspective than other settlements with housing allocations in the Draft Local Plan. **Directing further housing growth to North Weald Bassett through the development of the OPE represents a more sustainable option to meeting Objectively Assessed Needs than the distributed approach to housing delivery across multiple smaller settlements** (Coopersale, Fyfield, High Ongar, Lower Sheering, Roydon and Stabbleford Abbots), as is currently proposed in the Draft Local Plan.
- Furthermore, the *Interim SA* has identified higher development at North Weald Bassett as a reasonable alternative option to the housing allocations set out in Draft Local Plan Policy SP2. However, in appraising the higher development at North Weald Bassett, the *Interim SA* has not considered specific redistributions of housing allocations from other settlements in the District. **It is considered that this fundamentally restricts the ability of the *Interim SA* to fully appraise the option of higher growth at North Weald Bassett against the settlement housing allocations set out in Draft Local Plan Policy SP2.**
- The *Arup Site Selection Report* assesses an area of land of 190 hectares and assumes development potential for 6,018 homes across SR-0269A and SR-0310, which is vastly greater than the 15.26 hectares and 280 that has been proposed for development by Peer Group plc and that was previously proposed in *Allies & Morrison's North Weald Masterplanning Study* from 2014. **This major inaccuracy means that the OPE opportunity has been materially misrepresented in the site selection process and, specifically, has been incorrectly assessed in relation to the sustainability impacts ascribed to it in the *Arup Site Selection Report*.**
- If the correct development proposals had been assessed in the *Arup Site Selection Report*, then the scoring for the OPE site would have been significantly different with 23 (twenty three) of the 64 indicators (32 indicators per site assessment) showing a positive improvement.
- By comparing the corrected and consolidated site selection scoring for the OPE site with those allocated sites identified in Draft Local Plan Policy P6 for North Weald Bassett that were assessed in the *Arup Site Selection Report* (note: North Weald Bassett Airfield was not assessed).
- The Council's own sequential approach to site allocations (paragraph 3.54 of the Draft Local Plan) would place the OPE site (15.26 ha), advanced by Peer Group, ahead of all sites to the northwest of North Weald Bassett which are on (i) high quality agricultural land, (ii) in open and sensitive countryside, (iii) on high value Green Belt land and (iv) in close proximity to an active airfield.
- It can be seen, therefore, that **the OPE site represents a significantly more sustainable option for housing growth than all of the allocated sites to the north and west of North Weald Bassett. It should therefore be reconsidered for allocation in the Local Plan.**

Appendix One

Interim SA Topics and Objectives

The Interim SA Report defines the following topics and objectives (the “SA Framework”) against which the Draft Local Plan is assessed. Those objectives shown in grey italic text are not considered to be relevant to spatial factors and are therefore excluded from the comparative assessment.

Long-term Objective	Objectives
Air quality	Avoid worsening of existing issues through minimising traffic congestion
Biodiversity and green infrastructure	Avoid direct impacts to important biodiversity sites and linear features
	Avoid more indirect impacts (e.g. through pollution or development preventing adaptation of biodiversity to climate change)
	Carefully plan and implement multifunctional green infrastructure
	Support initiatives that seek to achieve biodiversity benefits, including through targeted habitat creation and enhancement
	Plan for biodiversity at a 'landscape scale'
Climate change (mitigation & adaptation)	<i>Lower greenhouse gas emissions</i>
	<i>Increase the amount of renewable and decentralised energy generation</i>
	Drawing on the SFRA, take a pro-active approach to reducing flood risk and mitigate risk associated with new development where it occurs
Community and wellbeing	Address pockets of deprivation
	Meet the health and social needs of a growing and ageing population, including through ensuring good access to community infrastructure
	Address all aspects of equality, where relevant to spatial planning
	Address issues specific to rural communities
	Provide facilities and infrastructure to support active living
Economy and employment	Maintain a diverse economy including through supporting existing sectors (inc. rural)
	Taking a long term view, support initiatives that capitalise on local strengths, including tourism potential (e.g. resulting from attractive towns and countryside)
	Ensure local job creation in line with local housing growth
	Maintain the key functions of local centres (also a 'community and wellbeing' issue)
	Address deprivation issues through targeted economic growth
Historic environment	Protect the district's heritage assets and their settings from inappropriate development
	Ensure that development respects wider historic character
Housing	Meet identified needs through providing new housing of the appropriate type (e.g. to reflect the ageing population and trend towards more single person households)
	Increase the provision of affordable housing
	Meet the needs of Travellers
Land and waste	Protect Green Belt that meets the nationally established objectives
	Make efficient use of land, accounting for land quality, and previously developed land
	<i>Support good waste management</i>
Landscape	Direct development away from the most sensitive landscapes and landscape features
	Maintain and enhance characteristic landscapes and landscape features
Transport	Bring about a modal shift in terms of commuting patterns, away from car dependency
	Promote and support investment in sustainable transport infrastructure, including in rural areas where access to services and employment is an issue
Water	<i>Minimise water use to mitigate the worsening problem of 'serious water stress'</i>
	<i>Maintain and improve water quality / water courses in line with legislative requirements</i>
	Direct development to areas with sewerage infrastructure capacity

Appendix Two

Comparison of further development options at North Weald

Criteria	OPE	SR-0158B	SR-0179	SR-0297	SR-0309	SR-0501
1.1 Impact on Internationally Protected Sites	0	0	0	0	0	0
1.2 Impact on Nationally Protected sites	0	0	0	(-)	0	0
1.3a Impact on Ancient Woodland	0	0	0	(--)	(--)	0
1.3b Impact on Ancient/Veteran Trees	0	(-)	0	0	0	0
1.4 Impact on Epping Forest Buffer Land	0	0	0	0	0	0
1.5 Impact on BAP Priority Species or Habitats	(-)	0	0	(-)	(-)	0
1.6 Impact on Local Wildlife Sites	0	0	0	(-)	(-)	0
1.7 Flood risk	(++)	(+)	(-)	(++)	(++)	(++)
1.8a Impact on heritage assets	0	0	0	0	(+)	(+)
1.8b Impact on archaeology	0	0	0	(-)	(-)	0
1.9 Impact of air quality	(-)	0	(-)	(-)	(-)	0
2.1 Level of harm to Green Belt	(-)	(-)	(-)	(-)	(-)	0
3.1 Distance to the nearest rail/tube station	(-)	(-)	(-)	(-)	(-)	(-)
3.2 Distance to nearest bus stop	(+)	(-)	(-)	0	0	0
3.3 Distance to employment locations	(+)	(+)	0	(+)	(+)	(+)
3.4 Distance to local amenities	(+)	0	0	0	0	0
3.5 Distance to nearest infant/primary school	(+)	0	0	0	0	(+)
3.6 Distance to nearest secondary school	(-)	(-)	(-)	(-)	(-)	(-)
3.7 Distance to nearest GP surgery	0	0	0	0	0	0
3.8 Access to Strategic Road Network	Deemed not applicable in the <i>Arup Site Selection Report</i>					
4.1 Brownfield and Greenfield Land	(-)	(--)	(--)	(-)	(-)	(-)
4.2 Impact on agricultural land	0	(--)	(--)	(--)	(--)	(--)
4.3 Capacity to improve access to open space	(+)	(+)	0	(-)	0	0
5.1 Landscape sensitivity	0	(-)	(-)	(--)	(-)	(-)
5.2 Settlement character sensitivity	(+)	(-)	(-)	(--)	(--)	0
6.1 Topography constraints	0	0	(-)	(-)	0	0
6.2a Distance to gas and oil pipelines	0	0	0	0	0	0
6.2b Distance to power lines	0	0	0	0	0	0
6.3 Impact on Tree Preservation Order (TPO)	0	0	0	(-)	0	0
6.4 Access to site	(+)	(+)	(+)	(+)	(+)	(+)
6.5 Contamination constraints	(-)	(-)	(-)	(-)	(-)	0
6.6 Traffic impact	(-)	0	(-)	0	(-)	(-)



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This Report was originally prepared to support the Regulation 18 response of Peer Group plc to the Public Consultation on the Epping Forest District Draft Local Plan Consultation in 2016. The original Report was dated 7 December 2016. The Report is being submitted again in support of Peer Group's Regulation 19 response but has not been subject to a review in light of any information or change in circumstances that may have arisen since the date of the original Report. Hillbreak Limited accepts no liability for any loss to any party, including our Client, in contract, tort or otherwise, that may arise as a result of any such change in information or circumstances.

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