

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

Stakeholder ID	1957	Name	Bridget	Uncle
Method	Letter			
Date	20/1/2017			

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Letter or Email Response:

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 over the next 17 years. Please tick the area/s you wish to respond to. Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sewardstonebury, Sheering and Stapleford Abbots (Draft Policy P 12) Do you agree with the proposed sites in SHEERING (Draft Policy P12)? (please tick one box) Yes Please explain your reasons for this Please use the below if you wish to upload an attachment to support your response to this question 1.0 INTRODUCTION 1.2 This representation is submitted on behalf of the owner of allocated sites SR-0033,Redacted.... ; and SR-0311, Sheering North Area. We support the allocation of these sites for 16 and 12 houses respectively. 1.3 Beyond confirming our support for the allocation of sites SR-0033 and SR-0311, this representation sets out below:- • Support for the principle of allocating development to Sheering • Comments on the future Green Belt boundaries around SR-0033 and SR-0311 • Comments on the accessibility criteria within the Site Suitability Assessments for the sites as provided at appendix B1.4.2 and B1.6.4 of the Site Selection Report • Comments on the 'Results of Stage 3 Assessment for Residential Sites in Sheering' (Appendix B1.5.2 of the Site Selection Report). • Comments on the noise impacts from the M11 in regard to site SR-0073 2.0 SUITABILITY OF SHEERING TO ACCOMMODATE FURTHER GROWTH 2.1 Sheering is a demonstrably sustainable location to accommodate additional housing, given the village has a comprehensive core of services including primary school, shop, a number of local businesses, a butcher, hairdresser, village hall and pub. GP services are provided in Hatfield Heath, however the village enjoys excellent public transport links with Hatfield Heath (travel time 3 minutes) with buses being at least hourly and more frequent in peak periods. There are similarly frequent links to Chelmsford and Harlow, which provide a full range of higher order services. Sheering is therefore well placed to make a meaningful contribution to meeting housing need in the district. 2.2 Paragraph 55 of the NPPF provides that Local Plans must take account of the need to ensure adequate levels of development in well serviced villages: "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities." The NPPG (paragraph 001 reference ID: 50-001-2016519) outlines rural housing as 'essential' to ensure the viable use of local services and community facilities and ensure thriving communities. 2.3 As outlined in our representation made on behalf of our client to the Community Choices consultation in 2012, there is further land beyond draft allocated sites SR-0033 and SR-0311 under the control of our client to deliver land for community infrastructure enhancements if required, subject to an overall assessment of viability and site capacities. This land is situated surrounding the village hall/recreation ground and primary school. Future Green Belt Boundaries 2.4 NPPF paragraph 85 outlines that when defining boundaries, local planning authorities should, "define boundaries clearly, using physical features that are readily recognisable and likely to be permanent." 2.5 The guidance does not stipulate

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that these physical features should exist now. As such, the creation of features such as new dense hedgerows or tree belts to define new boundaries as part of the site allocation/green belt review process should be acceptable in principle. 2.6 In this vein, our client is willing to commit to establishing new physical green belt boundaries such as hedgerows and tree belts prior to the commencement of development, i.e. enforced by condition on any planning consent for the development. 2.7 In terms of the exact position of green belt boundaries for each allocation, we appreciate that the boundaries at this draft Plan stage are indicative, with more detailed boundaries provided within the submission stage plan. 2.8 In this regard, for site SR-0311 we would highlight that the northern boundary should allow sufficient room for the site access to attach to the northernmost end of Primley Lane and swing round westwards into the site. We would be pleased to input into this process, with the benefit of the necessary highways and topographic survey information that we hold for the site. 3.0 COMMENTS SITE SELECTION REPORT ASSESSMENTS 3.1 The information provided on the suitability assessments for sites in Sheering at appendix B1.4.2 of the Site Selection Report appear to be wrong in respect of the categorisation for bus services and access to a GP Surgery from the village. These errors are carried over into the capacity and deliverability assessments at appendix B1.6.4. Site Assessments 3.2 Under criterion 3.2 of the site suitability assessment (appendix B1.4.2), the distance to a bus stop is given as more than 1000 metres. We note that the relevant criteria (page B98 of the Site Selection Report) outlines that this is the walking distance from the site to a bus stop with at least a peak hourly day service. Route 59, which runs through Sheering between Harlow and Chelmsford runs an hourly service between 7 am and 8 pm Monday to Friday, and similar hours on Saturday. This is supplemented by further services to Harlow on route 347. Stops for these buses are directly adjacent to site SR-0033, and within 400 metres of site SR-0311. These services are identified within the Settlement Hierarchy Technical Paper (see proforma for Sheering at page 64). 3.3 In regard to access to a GP surgery (criterion 3.7), this is indicated to be more than 4,000 metres distant. As outlined above, the catchment GP surgery for Sheering is at Hatfield Heath, which is therefore between 1,000 and 4,000 metres distant. This surgery is accessible by the regular at least hourly buses, with both route 59 and 347 stopping at Hatfield Heath, which is some 3 minutes away. 3.4 Within the Availability and Achievability assessments for the sites at appendix B1.6.4 commentary with regard to criterion 2.2, site viability outlines that SHMA viability data indicates that in this postcode area residential would be marginally viable, potentially overcome through flexible affordable housing. Sworders have extensive experience in the marketing and sale of greenfield residential development sites throughout Essex and Hertfordshire, as well further afield in the wider region and the midlands. We have no doubt that the site is viable in the current market and that it could support a 40% affordable contribution. Clearly, market conditions are not static, and could worsen; however we do not consider that viability is appreciably more marginal in this area of the district compared with other areas where concerns regarding viability have not been raised. 3.5 Within the Availability and Achievability assessments for site SR-0033 at appendix B1.6.4, commentary with regard to criterion 2.6 indicates that the site is more than 600 metres from publically accessible open space. The site is situated adjacent to the recreation ground and access could be provided directly to it from the site. As such we assume this an error in the assessment. 3.8 In regards to the Green Belt review, we note that are assessed within parcel 005.1, which is assessed as having a 'relatively strong' contribution to safeguarding the countryside from encroachment, but makes no contribution to other green belt purposes. This gives the parcel an overall 'harm' rating of high. The land to the south of the village (005.2), is considered to make a 'strong' contribution to protecting the countryside from encroachment and no contribution to other factors, as such the overall rating of harm if land in this location is to be released for development is identified to be 'very high'. 3.9 We note footnote 5 to the Site Selection Methodology outlined at page A21 of the Site Selection Report states that Council is using the outcome of the green belt review excluding purpose 3 for site selection purposes. The Stage 2 Green Belt view outlines at paragraph 5.4 that, "The results of the assessment against purposes 1, 2 and 4 (i.e. excluding purpose 3), illustrated in Figure 4.6, provide a more nuanced picture of how Green Belt performs across the District. This may provide the Council with a better tool and evidence base upon which to make decisions about the performance of Green Belt across the District and those locations where Green Belt release may be more appropriate. However, is the council decides to use these findings, we recommend that separate evidence on landscape character and quality should be applied - in order to distinguish between areas that are more and less sensitive to development in landscape terms." 3.10 As such, regard should be had to the landscape evidence base, which is set out within the Settlement Edge Landscape Sensitivity Study 2010 (SELSS). This report confirms that land to the north of the village, which is situated in landscape setting area 4 within the Study, has an overall sensitivity to change rating of moderate. In contrast, land to the south of the village, within landscape setting area 5, is considered to have a high overall sensitivity to change. This relative rating of sensitivity across the northern and southern sides of the village is

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recognised within the site suitability assessments provided at appendix B1.4.2 of the Site Selection Report but has not been carried forward to the justifications provided in appendix B1.5.2. 3.11 However, in addition to the above, it should also be noted that SR-0033 is in fact situated outside landscape setting area 4, having been judged in landscape terms by SELSS to be within the built up area of the village. As such, whilst this area does not currently fall within the development limits for the village, in landscape sensitivity terms the SELSS considers that it should. 3.12 Overall, a comparison of the performance of sites to the north and south of the village at both stage 2 (appendix B1.4.1 of the Site Selection Report) and stage 3 and 4 (appendix B1.5.2) reveal that sites to the north are not 'less favoured' - and clearly this has been recognised at the allocation stage, given sites to the north have been allocated. 3.13 Notwithstanding that the Site Selection Report results in a conclusion that we support, it is important to ensure it draws evidence based conclusions within the 'Justification for Option Suitability' provided at appendix B1.5.2, in order to satisfy sustainability appraisal requirements and avoid confusion. SR-0073 - Noise 3.14 We note the allocation of site SR-0073. We do not object to this allocation but wish to highlight that no consideration is given as to whether the full extent of the site is developable given noise impacts from the M11. Guidance on noise is consolidated within the NPPG at paragraphs 30-001 to 30-012 and further investigation of this issue should be undertaken during the preparation of the submission plan.