
Land to the south of Loughton

Objections to Epping Forest District Council Local Plan, submission version 2017

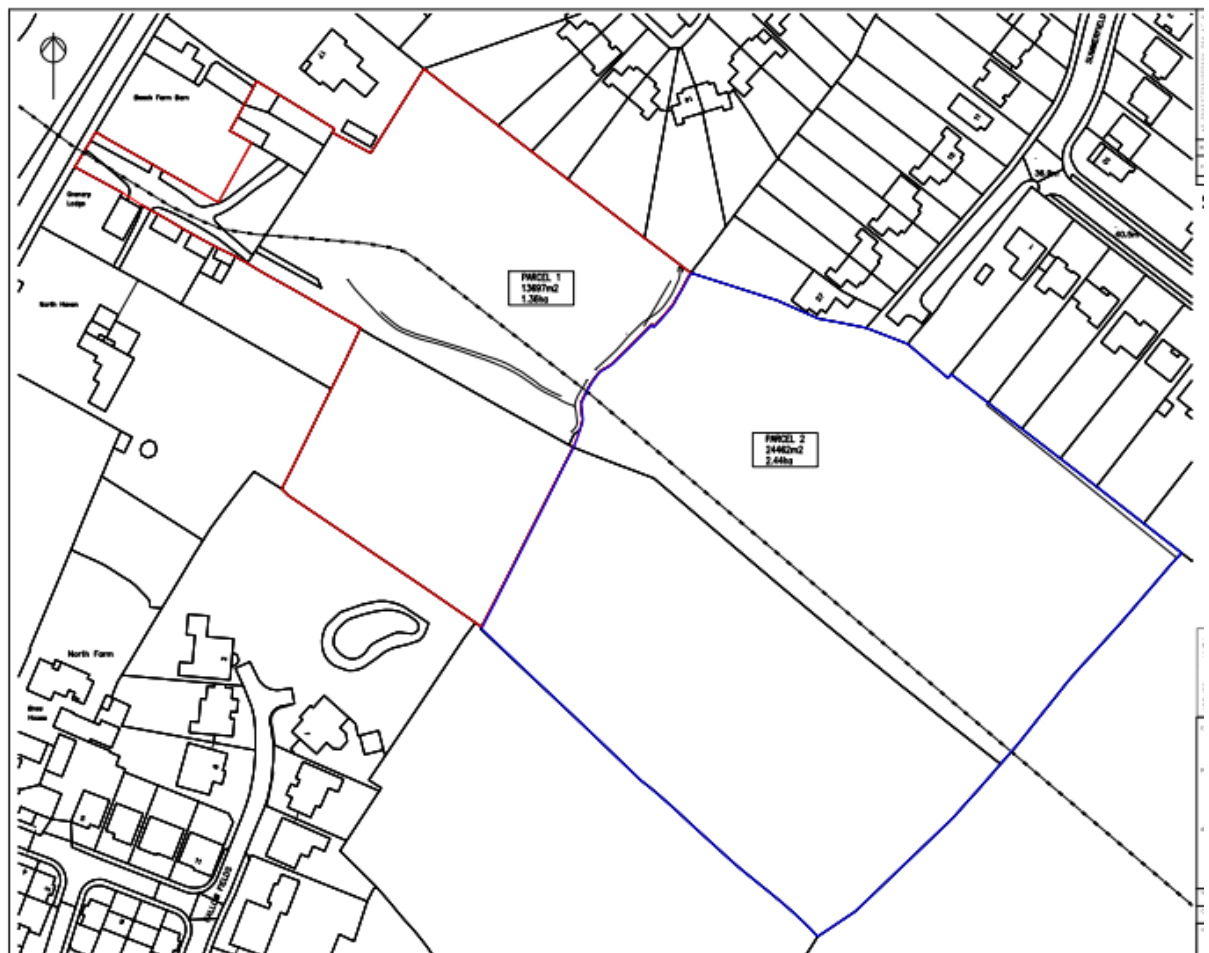
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Representations in respect to the land south of Loughton

1. We are instructed by Mr Paul Coster to promote the land at Beech Farm for residential purposes.
2. We submit a plan prepared by Form Architecture which confirms that there are two elements to this representation, namely:
 - **Parcel 1:** 1.36 hectares, the first component to the site area;
 - **Parcel 2:** 2.44 hectares, namely the larger area beyond, albeit we confirm that the land is still within the same ownership.
3. These are shown on the screenshot below:



4. Parcel one would deliver 30 dwellings and both parcels together in the region of 100 dwellings.
5. We object to the proposed submission draft local plan due to the non-inclusion of this land area for residential purposes.
6. We seek its deletion from the Green Belt and reallocation accordingly.
7. Our preferred position is the release of the entirety of the land area (namely both parcels 1 and 2) from the Green Belt and allocation for residential purposes.
8. An alternate position is the release of only parcel 1.
9. The land is owned by the Charles French Trust who have entered into an exclusive option agreement with Mr Coster to take this site forward as one which can deliver a sustainable residential scheme.
10. Whilst not a direct planning issue, as an appropriate matter of context, we note that monies from the sale of this land, once development potential has been established, will contribute towards the charitable works of the Trust supporting a variety of good causes in Essex and North East London.
11. The Trust's website confirms as follows:

In the year ended 31st March 2016 grants were distributed to projects in the following categories: Disabled and Disadvantaged (22%), Children and Youth (17%), Community (14%), Educational (11%), Elderly (10%), Medical (10%), Sports and Holidays (10%), and Hospices (6%)

12. The site is accessed from the A121 and lies to the south of Loughton. The access from the main road runs between existing built form (*Granary Lodge to the south; Beech Farm Barn to the north*) and opens out as per the plans

submitted with these representations. Part of the site currently supports non-agricultural horse use together with associated stables.

13. The London Orbital gas main runs through the site with newly erected surface infrastructure on one part of it behind a steel palisade fence, immediately behind the rear garden to Granary Lodge.
14. The London Orbital gas main is clearly a significant component of subterranean infrastructure but is not seen as a development impediment and clearly runs under existing built form across London.
15. Locationally the site is sustainable, and it is also deliverable.
16. The access from the High Road provides good visibility in both directions so there are no highway issues which would suggest that development could not come forward.
17. In addition, there is a well-lit pavement providing access if walking from the site to central Loughton: this walk is both direct; over a practical distance and reasonably attractive noting the woodland to the west.
18. There is therefore good and uninhibited access to all the shops and services provided by Loughton.
19. The residents from the representation site will also play a role in sustaining these shops and services, contributing towards the economic and social dimension to sustainable development.
20. The site is also in relatively close proximity to the Loughton underground station.
21. With regard to document appendix 6 C entitled "Loughton" which is published as part and parcel of the proposed submission draft, we note that there are no Green Belt releases on the outskirts of Loughton.

22. We acknowledge that a number of sites are allocated for residential development. All of these sites are within the urban area and some are relatively small providing only a small number of additional dwellings. We would note that it is likely that a number of these sites would come forward for development in any event as part and parcel of the planning application process as opposed to the Local Plan review process.
23. In respect of the release of Green Belt land and the merits of the release of this part of Green Belt we make a number of introductory points.
24. The first is that Epping Forest as a local authority area is comprised of 92% Green Belt land. The local planning authority therefore accepts that it would need to look at reviews of the Green Belt boundary and we note that the adopted Local Plan dates back to 2007 so a period of 11 years has passed since this matter was last looked at and scrutinised in the interest of providing a sustainable pattern of (primarily) housing development.
25. Paragraph 83 of the Framework confirms that Green Belt boundary should only be altered in exceptional circumstances through the preparation or review of the Local Plan. This advice needs to be seen within the context of the fact that this matter has not been reviewed for the past 11 years.
26. At paragraph 80 the NPPF confirms that the Green Belt serves five purposes as follows:
- to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict

and other urban land.

27. We assess the merits of the representation site within the context of these purposes.

28. In addition, paragraph 84 of the Framework states as follows:

84. When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.

29. National policy therefore seeks a sustainable pattern of development and a focus upon urban areas inside the Green Belt boundary.

30. In respect of the representation site it is clearly sustainably located.

31. In terms of the Green Belt issue and matters of coalescence, sprawl of large built up areas and the prevention of neighbouring towns merging into one another we note that the site is bounded by established built form to the north.

32. On the east side there is an established and defensible boundary formed by mature and established vegetation: we would add that if we had to fall back on only parcel 1, our alternate position, there is a ditch line which contributes towards creating a boundary albeit it would need to be augmented by further planting.

33. Beyond the broader representation site on the eastern side the land is owned by a public body.

34. To the south there is existing built form comprised of a comparatively recent residential scheme on former industrial land. This is key is forming the

southernmost limits of Loughton so that there is no coalescence with Buckhurst Hill: this area of built form to the south of Loughton is established and robust and of a material quantum so that it is defining in its role.

35. The western boundary is clearly created by the High Road.
36. In addition, the access to the site is between built form either side and therefore the perception of the openness of this land is not one readily perceived from the public domain.
37. The development of the representation site is either parcels 1 and 2 or just parcel 1 provides a sensible opportunity to bolster the local planning authority's housing supply position.
38. There is a certain logic to the other Green Belt releases that have been set out in the proposed submission draft Local Plan (noting our comments that none are proposed in Loughton) where there is regard to established built form and clear and defensible boundaries.
39. This site is entirely in accordance with the sensible aims and provides to support the local planning authority for the foreseeable future.
40. Its inclusion ensures the soundness of the emerging Plan and ensures that it is, with regard to paragraph 182 of the NPPF in the context of the examination of Local Plans;
41. **planned positively;** by providing the much-needed housing in a sustainable location. Loughton has a population of about 31,000: the additional residents who would live in the town because of this allocation would make a sensible and managed addition to these numbers in a positive sense;
42. **justified;** by our points in respect of locational sustainability and Green Belt policy;
43. **effective:** by delivering sustainable development;

44. **consistent with national policy:** for the reasons as set out in this submission.