

17 May 2018
Our Ref: 11.120

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Dear Sir or Madam

Re: Supplementary Representations to the Epping Forest District Local Plan

I write further to your email dated 19 April 2018 which invited supplementary representations to be submitted to Epping Forest District Council (EFDC) to take into account the finalised version of the Appendices B and C of the Site Selection Report, December 2017. These Appendices were not published as part of the public consultation on the Submission Version of the Local Plan which took place between December 2017 and January 2018.

Having reviewed the content of the relevant Appendices we consider that there are two aspects which warrant supplementary representations in respect of the Latton Priory site, namely:

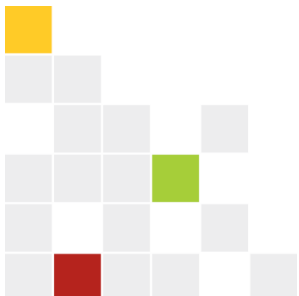
- The Site Deliverability Assessment; and
- Landscape Terminology and Boundary Definitions.

We have set out our comments on each of these two matters below but do reserve the right to supplement these representations through the Examination process if required.

Site Deliverability Assessment

Having given consideration to the '*Site Deliverability Assessment*' which was undertaken in order to inform the proposed quantum and form of development to be delivered at Latton Priory we have a number of concerns in relation to the methodology which has been employed.

Firstly, we would note that the approach adopted in this assessment is in many instances difficult to follow. This is primarily because no information is provided about the areas to which the Local Planning Authority are referring and/or there is a lack of any justification to evidence why certain assumptions or decisions have been made regarding the site. An example of this is the reference to the HSE Inner Zone which is identified as a site constraint which affects the extent of the development area. The presence of this constraint is the removal of 1.60ha of land which is not considered to be developable. It is however unclear which area of land the Council considers this constraint to impact and whether it would indeed preclude any form of development from coming forward in this location.



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In addition the Council have also identified 4.48ha of land which has been removed from the developable area of the site as it has been identified as BAP Habitat. Once again it is uncertain from the information provided by the Council which areas this relates to and whether all forms of development would be unachievable in this location.

With regards to the proposed density for the site it is noted that reference is made to a Garden Town density of between 30 dph and 40 dph. There is however no evidence provided by the Council to justify this proposed density range and neither is it clear why a prescriptive density for the Garden Town is required. Furthermore, following from the identification of this density range a residential density for the Latton Priory is established at 36 dph. There is however, once again no justification provided as to why a figure of 36 dph has been adopted for this site and for the purposes of this assessment.

Regardless of whether this figure is considered to be an appropriate density for the site we are uncertain why the Local Planning Authority have sought to reduce this density, firstly to 27.4dph to reflect the proposed mixed use of the site and then further to 17.8dph to reflect the gross to net adjustment. We consider this to be an unjustified and illogical manner in which to identify the overall developable area of the site. Instead we would recommend that the Council take the total developable area of the site and subtract from this figure the total area of land which has been identified for non-residential uses. This would then provide a total developable area for residential uses to which the appropriate density figure (36dph as proposed by the Council) could be applied.

We consider that the approach set out above would represent a far more logical and justifiable method of assessment than which has been utilised by the Local Planning Authority in the published evidence base. Should the Council continue to utilise the methodology they have adopted to date then clear and robust justification should be set out demonstrating why this approach is appropriate and clarifying how the figure of 17.8dph has been derived.

In respect of the availability and achievability assessment which has been carried out we would note that the site also has the potential to accommodate a primary school, a secondary school and a health facility within its boundaries. These factors are not currently identified and are therefore absent from the assessment which has taken place.

Furthermore, we also note that reference is made to the need to limit development to the northern part of the site in order to minimise impacts on views from south Harlow and also on ecological constraints. Our comments in relation the landscape constraints identified are set out later in this letter however, we note that there is no evidence or justification to support the references to ecological constraints.

Finally, we would note that the site boundary utilised in this assessment is different from the site boundary adopted in the Submission Version of the Local Plan. There is as such inconsistency between the Local Plan and its associated evidence base.

Landscape Terminology and Boundary Definitions

As set out above one of the key areas, which we consider requires supplementary representations, in relation to the newly published elements of the Site Selection Report, is landscape. To accompany this supplementary representation a technical note prepared by FPCR is provided at **Appendix 1**.

This sets out in full our response to the information contained within Appendices B and C of the Site Selection Report, December 2017 in relation to landscape.

In summary, however, we have significant concerns with regards to the use of the term 'ridgeline' which we consider to be erroneous and misleading. As demonstrated in Appendix 1 and also in our previous representations in relation to the emerging Local Plan the landform is actually an elevated plateau and not a ridgeline.

Furthermore, it is noted that the most logical approach to defining the new Green Belt boundary at Latton Priory would be to respond to the existing established hedgerow field boundaries and mature woodland, which already provide levels of visual containment. These could be reinforced and expanded if necessary as part of a comprehensive green infrastructure strategy.

This approach would ensure that the development capacity of the site is maximised, whilst ensuring adequate visual and physical separation between the built development edge and the new Green Belt boundary.

We would welcome further discussions with officers in relation to this matter and hope that this can form part of future strategic masterplanning work with the Local Planning Authority in respect of this site.

Conclusion

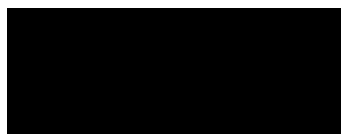
These supplementary representations have been prepared by Boyer on behalf of CEG and Hallam Land Management Ltd in response to the invitation from EFDC to comment upon Appendices B and C of the Site Selection Report, December 2017, which have previously not been published.

Whilst our clients' remain broadly supportive of the Local Plan and its spatial strategy, as set out above and in the information which supports this supplementary representation, we do have concerns in respect of a number of assumptions made in the Site Selection Report. These assumptions have informed the nature and form of the proposed allocation at Latton Priory and associated development management policies. As such we consider it vital that these issues are resolved prior to the adoption of the Local Plan in order to ensure that the potential benefits of this site are maximised as well as ensuring efficient and best use of the site.

We welcome this opportunity to provide EFDC with supplementary representations in relation to the emerging Local Plan and look forward to working with officers in a positive and proactive manner to bring forward the aspirations of the Local Plan and in particular the delivery of Latton Priory.

If it would be beneficial to discuss any of the matters highlighted in this supplementary representation further or indeed any other matters relating to Latton Priory and/or the Local Plan then please do not hesitate to contact me.

Yours faithfully



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Director

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Boyer

Appendix 1 – FPCR Technical Note



17 May 2018

Latton Priory, Harlow

1.0 Introduction

- 1.1 This technical note has been prepared by FPCR Environment & Design Ltd in response to the invite from Epping Forest District Council (EFDC) to interested parties, to make representations on the recently published Appendices B & C of the Site Selection Report.
- 1.2 The technical note responds to the use of the term 'ridgeline' within the Site Selection Report, which, from an evaluation of the landscape, is considered to be erroneous and misleading.
- 1.3 The site is located upon elevated ground that contains the built-up area of Harlow. Where there maybe opportunities in which to look back towards the site from Harlow the landform gently rises to the south of the town to give the notion of a 'perceived ridge'. As can be seen from the representative photographs looking across the site from the Council's allocation line, the landform is that of an elevated plateau rather than that of a ridgeline in the widest sense, which is defined as *"a long, narrow hilltop, mountain range, or watershed"*.
- 1.4 Within the Executive Summary of the Harlow Strategic Site Assessment Final Report (September 2016), AECOM make the following conclusion with regard to Site M: Latton Priory:

"Our analysis suggests that there is potential for growth to the south, although the 'ridge line' is an important boundary that should not be breached, unless the benefits of development are capable of outweighing harm to the landscape, alongside appropriate mitigation."
- 1.5 The AECOM conclusion that informs the EFDC allocation proposal is flawed. As evidenced by the attached photographs, and from a ground investigation, there is no clearly defined 'ridgeline' or an *"important boundary"*. The subtle

level changes mean that a 'ridge' could arbitrarily be defined at any point across the plateau.

- 1.6 AECOM refers to the importance of woodland on the skyline within Appendix 2, where they recommend:

"There is also an opportunity to form a stronger green infrastructure network by connecting existing woodland blocks with new planting. This could also include improving connectivity between the larger area of woodland either side of the site: Pardon Wood Nature Reserve on the west and Mark Bushes on the east. This would further reinforce the wooded skyline which typifies views to the west and east from Harlow Town centre and could create a buffer of vegetation to prevent views of development on the southern edge of Harlow from Epping to the south".

- 1.7 The most logical approach to defining the limits to the Green Belt boundary would be to respond to the existing established hedgerow field boundaries and mature woodland that already provide levels of visual containment. These can readily be reinforced and expanded, as recommended by AECOM, through additional planting as part of a comprehensive green infrastructure strategy. The most sensible line to draw across the plateau to achieve this would be across the southern edge of the plateau before the landform begins to gently fall to the south near Rye Hill Road; the line defined by the southern site boundary as shown on the aerial photograph (Figure 2) and on Photo Viewpoint 4 (Figure 1) where the southern field boundary hedgerow and woodland is evident on the skyline. This can be developed further through the masterplanning process.
- 1.8 Defining the southern edge of the plateau allows the development capacity of the site to be maximised, whilst allowing for the existing green infrastructure of established woodland and hedgerow field boundaries to contain the built development and the Harlow settlement edge, providing visual and physical separation from the valley to the south and forming an appropriate Green Belt boundary
- 1.9 This green edge, in combination with the proposed extension of the southern Harlow green wedge across much of the site - can be designed to present a wooded setting in any views from Harlow, extending the woodland blocks already evident which is an approach recognised by AECOM. This will also preserve the setting and character of Harlow as envisaged by Frederick Gibberd.

Woodland Block A

Water Tower



PHOTO VIEWPOINT 1: Within the Site

Dorrington Farm



Note: Based on a viewing distance of 175mm and focal length of 50mm

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client
CEG & Hallam Land Management

project
Latton Priory,
Harlow

drawing title
PHOTO VIEWPOINT 1

scale
NTS @ A3

drawing / figure number

Figure 1

drawn
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PHOTO VIEWPOINT 2: From public open space adjacent to Stewards, Harlow



Note: Based on a viewing distance of 175mm and focal length of 50mm

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Figure 1




PHOTO VIEWPOINT 3: From Rye Hill Road



Note: Based on a viewing distance of 175mm and focal length of 50mm

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Figure 1



PHOTO VIEWPOINT 4: From Rye Hill Road



Note: Based on a viewing distance of 175mm and focal length of 50mm

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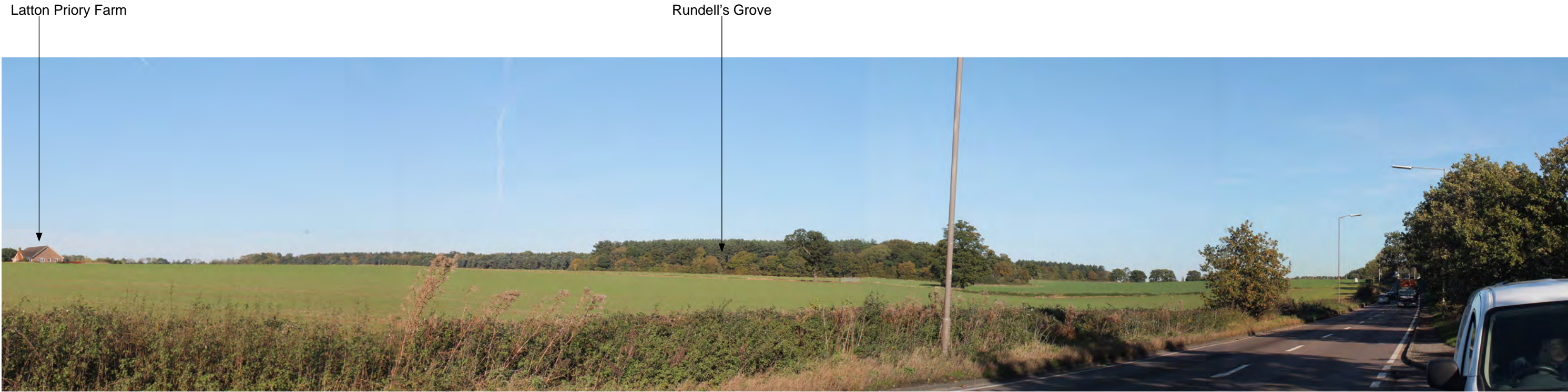
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Figure 1




PHOTO VIEWPOINT 5: From London Road



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PHOTO VIEWPOINT 5

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Figure 1



 Draft Local Plan Site Allocation Area Boundary



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project
Latton Priory,
Harlow

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AERIAL PHOTOGRAPH WITH
PHOTO VIEWPOINT LOCATIONS

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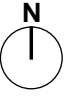


Figure 2