

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

Stakeholder ID	2869	Name	Steve	Allan	Stallan Developments Ltd
Method	Letter				
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Letter or Email Response:

Epping Forest Local Plan – Representations on Behalf of Stallan Developments Ltd (December 2016) Response to Draft Policy P 10 1.1 We have been instructed on behalf of our client Stallan Developments Ltd to submit representations to Epping Forest District Council in regards to the Local Plan Draft Consultation 2016. 1.2 We act for a Stallan Developments Ltd who has an interest in Fernbank Nursery, Nazeing Road, Lower Nazeing, Essex, EN9 2JN. This site extends to an area of approximately 3.03 hectares and is broadly rectangular in shape, with vehicular access being provided to Nazeing Road to the south (please see attached site location plan). An outline application for 50 dwelling, including means of access, has recently been lodged with Epping Forest DC. 1.3 The draft Local Plan sets out draft strategic policies, how much development is planned and detailed policies in respect of housing and Green Belt. We note that Draft Policy SP 2 confirms the future housing provision over the plan period of 11,400 new homes and at least 220 units will be accommodated in Nazeing. Draft Policy P 10 confirms the Council's 'preferred' residential site allocations for Nazeing, all of which are currently designated as Green Belt. We also note that the 'Report on Site Selection' prepared by Arup (September 2016) informed the draft site allocations across the district, including those at Nazeing. 1.4 The 'Report on Site Selection' (by Arup) included a 'Site Suitability Assessment' of the Fernbank site (Site 0160), as well as the sites being proposed for allocation (please see attached extracts). This assessment provided a score against numerous criteria and this included "3.1" to "3.7" which relates to distances to rail station, bus stop, employment locations, local amenities, primary and secondary schools, and GP surgery. 1.5 The Fernbank site (0160) was given positive scores in respect of distance to bus stop (on Nazeing Road – 200m from the site), employment locations (Hillgrove Business Park – 700m to the west) local amenities (shops on Nazeing Road – 100m to the south), primary school (Nazeing County – 550m to the south east) and GP surgery (Nazeing Valley Health Centre – 800m to the north). It was been given a neutral score in terms of distance from rail station (closest of which is Broxbourne – 2.5km to the west) and a negative score in terms of distance to nearest secondary school (closest of which is Stewards Academy – 8.6km to the north east). 1.6 The Site Suitability Assessment prepared by Arup (on behalf of Epping Forest DC) confirms that the Fernbank site (0160) is more accessible than each of the 4 sites being put forward for residential allocation in the draft Local Plan (i.e. SR-0011, 0150, 0300 and 0473). 1.7 As outlined above, all the sites being put forward for allocation, as well the Fernbank site (01610), are currently designated as Green Belt. We note that the Fernbank site was assessed as part of a larger parcel of land within the Epping Forest District Green Belt Assessment: Stage 2 (August 2016). An extract from the Stage 2 assessment is attached to this note which relates to 'Parcel 066.5'. This includes the Fernbank site, along with land to the west and north. Whilst this assessment covers a larger area, the

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results of the assessment remain relevant to identifying the harm arising from the release of the site for development.

1.8 The Stage 2 assessment includes a summary of parcels contribution to the 'Purposes of Green Belt' (note it specifically excludes purpose 5 i.e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land). This confirms the parcel's contribution: "Weak" contribution towards the 1st Green Belt Purpose ("to check the unrestricted sprawl of large built-up area"). The assessment confirms that the parcel of land is close to Hoddesdon but is separated by the Lee Valley and any development within the parcel would not be perceived as sprawl from Lower Nazeing. "Relatively Weak" contribution towards the 2nd Green Belt Purpose ("to prevent neighbouring towns merging into one another is"). The assessment confirms that the parcel of land is close to Hoddesdon but ribbon development along Nazeing Road already extends out across much of the settlement gap. Again, the separation as a result of the Lee Valley would mean that broad coalescence would not occur. "Moderate" contribution towards the 3rd Green Belt Purpose ("to assist in safeguarding the countryside from encroachment"). The assessment confirms that much of the parcel is covered by glasshouses, with associated residential, but open fields to the western half to the south of Nursery Road. It confirms that the houses at the southern end of Nursery Road and Nazeing Road limit the extent to which the area is perceived as countryside. Furthermore it concludes that the eastern half of the parcel (which we note would include the Fernbank site), on sloping ground has more relationship with the settlement than the flatter fields to the west and can be considered to make a relatively weak contribution to this purpose. "No Contribution" towards the 4th Green Belt Purpose ("to preserve the setting and special character of historic towns"). The assessment confirms that there is no relationship between the parcel and any historic town.

1.9 Therefore based on the Epping Forest District Green Belt Assessment, carried out on behalf of the Council, it is clear that the Fernbank site provides a 'weak' or 'relatively weak' contribution to the 4 assessed Green Belt Purposes. In respect of the 5th purpose, i.e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land, we note that this was not assessed as part of the Council's assessment. We are not aware of any derelict and / or other urban land in need of recycling. In fact there is clear evidence of the need to consider expansion into the Green Belt in order to maintain housing land supply, as confirmed by the draft Local Plan. Therefore we consider that the application site provides 'no contribution' to the 5th Green Belt Purpose.

1.10 We also note that the 'Report on Site Selection' (by Arup) provided a score against criteria '2.1 Level of harm to Green Belt'. The assessment confirmed: "Site is within Green Belt, where the level of harm caused by release of the land for development would be very low, low or medium"

1.11 Whilst the site maybe defined as 'greenfield' due to the nature of the former / current agricultural use, we consider that it will not harm on the openness of the Green Belt, in fact it will result in a positive impact, as confirmed by the recently submitted outline application. The submitted outline application / indicative scheme confirms that the level of built footprint will reduce by up to 80% and the building volume by up to 50%. Furthermore the indicative scheme includes a significant area of open space along the western boundary, beyond which is open fields. It is clear that the proposals will therefore result in an increase in openness of this part of the Green Belt by removing the existing glasshouses and hardstanding and provision of significant areas of open space / landscaping and new residential development

1.12 We have reviewed Arup's 'Site Suitability Assessment' in relation to sites 0011, 0300 and 0473 (see attached extracts). We note that under '2.1 Level of harm to Green Belt' this concludes that the level of harm caused by the release of these sites would be 'none'. We note that these sites were also assessed as part of a larger parcel of land within the Epping Forest District Green Belt Assessment: Stage 2 (August 2016). A further extract from the Stage 2 assessment is attached to this note which relates to 'Parcel 067.5' and 'Parcel 067.4' (as per attached), which includes sites 0011, 0300 and 0473. Whilst this assessment covers a larger area, the results of the assessment remain relevant to identifying the harm arising from the release of such sites.

1.13 As outlined above, the Stage 2 assessment includes a summary of parcels contribution to the 'Purposes of Green Belt' (note it specifically excludes purpose 5 i.e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land). This confirms the two parcel's made 'no contribution' to purposes 1, 2 and 4, however they made a 'strong contribution' to purpose 3 ("to assist in safeguarding the countryside from encroachment"). In light of this it is unclear how the release of any of these sites from the Green Belt will result in 'no harm', as per the conclusion of the Arup's 'Site Suitability Assessment', carried out on behalf of Epping Forest DC.

1.14 We note from the above and attached extract from the 'Report on Site Selection' that despite its scoring it was determined that it 'should not proceed for further testing' after Stage 3 of Arup's assessment (please see attached extract). We note that the difference between site 0160 and those suggested for allocation (in particular 0011, 0300 and 0473) appears to relate to the 'Location' ranking. Site 0160 scored 5 (i.e. 'of greater value to the Green Belt if the land meets other suitable criteria for development') and the others scored 4 (i.e. 'Of least value to the Green Belt if the land meets other suitable criteria

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for development'). We are unclear as to how Arup reached this conclusion and request that EFDC clarify how the 'Location' ranking was arrived at Stage 3 and would request clarification from EFDC? 1.15 In light of the above and attached, we are concerned that the assessments carried out by Arup and used to inform the current Local Plan site allocations under Draft Policy P 10 Nazeing are not robust. Furthermore, we consider that our client's site at Fernbank Nursery (Site 0160) should be allocated for residential development given that it outperforms sites 0011, 0150, 0300 and 0473 in respect of its suitability / accessibility. Furthermore it will result in limited harm to the green belt from its release for development, in fact we consider that it will result in a positive impact due to the resulting increase in openness of this part of the Green Belt (as demonstrated by the submitted outline application / indicative scheme).