

**Epping Forest  
District Council  
Examination**

**Hearing Statement  
Matter 4**

**Sworders on Behalf of  
The Landowners of ONG.R1  
(Eales-White, Johnson, Kerr,  
Kerr, and McKinney)**

**Sworders  
January 2019**



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## **1.0 INTRODUCTION**

- 1.1 This hearing statement considers Matter 4 – The Spatial Strategy/Distribution of Development, and specifically, Issue 4, Questions 1 and 2.
- 1.2 It is submitted on behalf of the landowners of site ONG.R1 – Eales-White, Johnson, Kerr, Kerr, and McKinney.
- 1.3 This Hearing Statement supplements Sworders’ Regulation 19 representations made on behalf of the landowners in January 2018 (19LAD0070), and considers the Inspector’s Matters, Issues and Questions in relation to Week 2 Matter 4 of the Epping Forest Local Plan Examination.
- 1.4 **I do not wish to attend the hearing in relation to this matter.**

## **2.0 ISSUE 4: IS THE DISTRIBUTION OF DEVELOPMENT JUSTIFIED IN RESPECT OF THE NEED FOR, AND APPROACH TO, GREEN BELT RELEASE?**

- 2.1 In response to **Question 1**, we support the Council’s approach.
- 2.2 As set out in the Background Paper on Green Belt and District Open Land (EB1608), exceptional circumstances do exist, and Green Belt release is justified in order to facilitate wider strategic development goals in the Housing Market Area. This judgement has been reached in the context of the specific circumstances relating to the District (with 92% of the District designated as Green Belt), a stringent and thorough process to minimise development outside of the Green Belt, and a balance between protecting areas of high performing Green Belt land where possible, but also taking into account matters of sustainability, protection of the environment and landscape, supporting regeneration and the delivery of the required growth.
- 2.3 Green Belt release is required in order to promote sustainable patterns of development to meet objectively assessed needs for development in the District over the Plan period; it is simply the only option remaining to meet the development needs of the district and failing to meet those needs would not contribute to the achievement of sustainable development in



accordance with national planning policy.

- 2.4 Having demonstrated these exceptional circumstances, the preparation of the Local Plan is the appropriate mechanism to make these amendments, in accordance with national policy.
- 2.5 Local Plan Policy SP2 sets out an appropriate development strategy which seeks to minimise the loss of the Green Belt through first allocating sites within existing settlements, and focussing development in the most sustainable locations. However, as set out above, release of land from the Green Belt is necessary to meet objectively assessed housing need, and the release of sites has been comprehensively informed through Green Belt Assessments, and Site Selection Reports, with full consideration given to all other reasonable alternatives.
- 2.6 In response to **Question 2**, we support the overall approach taken by the Council regarding Green Belt release, and consider this to be robust.
- 2.7 As set out in paragraphs 2.133 to 2.142 of the Plan, it is entirely appropriate to alter the Green Belt boundary in order to release sites for development. Paragraph 83 of the NPPF makes it clear that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of a Local Plan. Whilst it is acknowledged that housing need alone does not constitute the exceptional circumstances necessary to release Green Belt, housing need combined with local conditions means that it is simply the only option remaining to meet these needs. Insufficient land outside the Green Belt exists to meet the development needs of the district.
- 2.8 This hearing statement is submitted on behalf of the landowners of site ONG.R1. The Green Belt Assessment 2016 (EB705A) includes this site as the western part of parcel 013.3, with ONG.R2 comprising the eastern part. The conclusion for this parcel is that the level of harm caused by release from the Green Belt would be 'high' in the context of purposes 1, 2, 3 and 4, and would remain 'high' when purpose 3 is omitted.
- 2.9 Whilst site ONG.R1 scores highly in terms of its level of harm associated with release from the Green Belt, the majority of other sites at Ongar also score 'high' or 'very high' in this assessment. Sites that scored lower overall are predominantly located further north and south of the settlement, and therefore more detached from services and facilities. Further, those sites were also deemed to perform a 'strong' role in relation to purpose 3, safeguarding



the countryside from encroachment, whereas parcel 013.3 performs a 'relatively weak' role in respect of this purpose, which clearly weighs in its favour.

- 2.10 The Council's approach to strategic development at Ongar is set out in paragraphs 5.61-5.65 of the Plan and concludes that the most appropriate spatial options are to focus development within the existing settlement boundary, and to expand the settlement to the north, west and south. Whilst it is acknowledged that part of the strategic option to expand to the north and west are sensitive in Green Belt terms, it is considered that the opportunities for sustainable development would outweigh potential harm, and that any harm to the Green Belt can be limited through suitable mitigation.
- 2.11 Site ONG.R1 has the benefit of a strong defensible boundary to the south, and the Green Belt Assessment Technical Annex (EB705B) states that *"no other stronger boundaries exist close to the settlement edge"*. The site is also defined in this document as being *"within the overall envelope of the settlement"* wherein development *"would not result in any reduction in the gap between the two towns."* In comparison to other sites, development of site ONG.R1 would be one of the least harmful options for Ongar, and development of this site would not conflict with the purposes of including land in the Green Belt.
- 2.12 A more recent Background Paper on Green Belt and District Open Land for Draft Plan Consultation 2016 (updated 2018) (EB1608) provides further support for the release of this parcel of land from the Green Belt, subject to strengthening of the southwest boundary which can be secured as a mitigation measure.
- 2.13 In accordance with NPPF paragraph 84, Green Belt boundaries should be defined to take account of sustainable patterns of development. Ongar is a sustainable and suitable location for the scale of development proposed, and the assessment for Green Belt release therefore appropriately weighs this in the balance of consideration in the site selection process.
- 2.14 We therefore consider this assessment to be robust, and given that Green Belt release is the only option remaining to accommodate housing need in this area, this process justifies the release of this land from the Green Belt.



### **3.0 SUMMARY**

3.1 This hearing statement is submitted on behalf of the landowners of ONG.R1, who support the Council's approach to the distribution of development, including the allocation of site ONG.R1 and its release from the Green Belt. Specifically;

- The Council's approach to Green Belt release is justified, as supported by a robust assessment of the contribution of individual parcels to the Green Belt, and a balance of other planning considerations, including supporting patterns of sustainable development.
- The scale of Green Belt release is justified and proportionate as it is necessary in order to deliver the District's housing need.