

## **INSPECTOR'S MATTERS, ISSUES & QUESTIONS**

### **Week One**

**Response from Jim Padfield.**

## **Matter 4**

**Issue 2 Question 4 Is it justified for North Weald Bassett (NWB) as a Large Village to be allocated more development than the Towns of Loughton, Waltham Abbey and Ongar? More generally, would the proposed growth of NWB be disproportionate, particularly when development at nearby Thornwood and Hastingwood is taken into account?**

The town of Ongar has been allocated 590 dwellings and the village of North Weald 1,051 dwellings. The housing allocation in Ongar spread over to 2033 represents little more than a continuation of the recent growth in the Town.

Ongar is a Town with a new secondary School, two primary schools, a range of shops, it is served by both Sainsburys and Tescos, a library, numerous pubs and restaurants, a national builders merchant, a leisure centre, a new medical centre and a thriving professional community.

Historically Ongar has been the centre for a wide rural catchment, indeed the Ongar Hundred was one of 19 Essex Anglo Saxon administrative centres covering 57,000 acres. This is still true today with over 12,000 people registered at the new health centre. There are good employment opportunities, within Ongar's rural catchment the restructuring of Agriculture has led to a resurgence of small businesses working from redundant farm buildings.

Ongar, particularly south Ongar, is a centre which could, with suitable public transport links, take advantage of the new fast Elizabeth Line into London thereby relieving pressure on the Central Line at Epping.

The EFDC Town Centre Study found that Ongar is sustainable, 46% of residents walked into the centre to do their shopping the highest percentage in the District. Ongar also had the highest numbers of 'good or very good' responses for environmental factors within the centre, it was most liked because of its character and atmosphere. Ongar Town centre is also a thriving workplace, 32% of the visits are to work in the centre, the highest in the District.

Despite the planned 50% growth the eventual size of North Weald at the end of the Plan period will still not be sufficient to justify a major supermarket or importantly a secondary school.

The Town and Country Planning Association Publication, 'Best Practice in Urban Extensions and New Settlements' (2007) states: "*A place needs to be large enough to support a secondary school... The reasoning is that a community that cannot provide for its children through to adulthood is not sustainable, and that the quality of community life is impoverished if older children do not participate because they are sent elsewhere each day. Growing up in a sustainable community also provides a sound foundation for citizenship.*"

Whilst Ongar has a new Library provided by Essex County Council as part of its statutory provision, North Weald's Library is judged by ECC in its "Essex Future Library Services Strategy 2019-2024" in full knowledge of the proposed development as "not required" and so faces closure.

The overdevelopment of North Weald threatens the sustainability of their Village, at the same time the Town of Ongar is denied the long term planned growth required to maintain and enhance its sustainability. It is insufficient to justify long promised infrastructure improvements especially the Essex County Councils proposed Eastern Bypass.

The Plan clearly does not comply with the relevant NPPF policies, it is required:

*"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.*

**Matter 4, Issue 4: Is the distribution of development justified in respect of the need for, and approach to, Green Belt release?**

**Have alternatives to Green Belt release been fully considered: ii. Has the density of development been maximised, on brownfield and greenfield allocations?**

I note the issue of density is also discussed under:

Matter 6 Issue 1 "In determining the contribution of allocated sites to the housing land supply, how have site densities been worked out? Is there any general risk that the capacity of sites has been over-estimated?"

Matter 7 Issue 1. "Are the densities required by Part I(ii) and (iii) justified having regard to the likely effect upon the character of the relevant areas?"

The Plan objectives are clearly stated in 2.27 as:

*"ensure that the design, density, layout and landscaping of new development is sensitive to the character of the surrounding area."*

Whilst we appreciate the need to ensure efficient use of land released from the Green Belt, we are concerned that the pressure to limit Green Belt release has resulted in a Plan that is reliant on significantly higher densities on sensitive settlement edges than are realistically and appropriately achievable. In fact the Plan as proposed around Ongar ignores its own Plan Objectives.

All but one of the allocations around Ongar are on the sensitive settlement edge, proposed densities in the Plan are as follows:

- West Ongar Concept Framework - 40.3 dwellings per hectare (40% of the total Ongar allocation)
- Ongar site ONG.R4 - 43 dwellings per hectare (28% of the total Ongar allocation)

However, other Masterplan allocations in similarly sensitive settlement edge situations are lower than at Ongar, for example:

- North Weald Masterplan Area density - 24.3 dwellings per hectare.
- Waltham Abbey North Masterplan Area density - 21.9 dwellings per hectare

In fact, even in urban situations densities are lower than in Ongar, for example at the Jessel Green Masterplan Area the proposed density equates to 38.3 dwellings per hectare.

However, these plan densities do not represent reality. Once all the constraints are taken into consideration the proposals for West Ongar show that the densities will be even higher.



The above illustration shows the reality that the 234 houses planned for West Ongar have to fit into a developable area of 3.34 ha, that is 70 dwellings per ha.

However, just to accommodate the 550 car parking spaces required by the Essex County Council minimum parking standards will absorb 27% of that developable area.

The neighbouring existing Great Lawn Estate has 39 dwellings on 1.49 ha so 26 Dwellings per ha. It is worthy of note that this estate was also built prior to the modern planning requirements for sustainable urban drainage (likely to be balancing ponds) and play spaces. Whilst of course development can also rise higher, we question whether this is appropriate in an Ongar context.

Ongar densities have been set at excessive, almost impossibly high levels. They are directly contrary to the Plan's objective to be "*sensitive to the character of the surrounding area.*" As such, in a Green Belt context we consider that densities have been overly maximised.

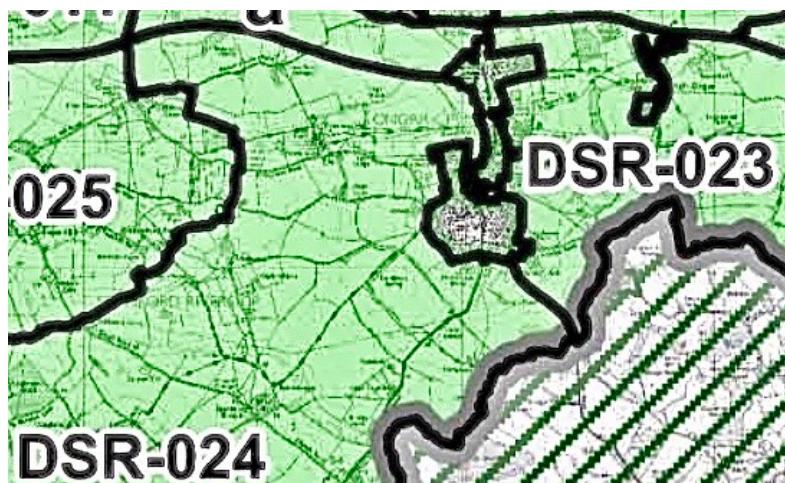
If this Plan is to satisfy one of its primary objectives to "*ensure that the design, density, layout and landscaping of new development is sensitive to the character of the surrounding area*", additional sites will have to be released for development to meet the district's housing needs.

**Issue 4 Question 2: Are the changes proposed to the Green Belt boundary informed by a robust assessment of the contribution made by individual sites to the purposes of the Green Belt (EB74A-B; and EB705A-B)? How were the findings of the Green Belt Review weighed in the balance with other planning considerations in the site selection process?**

A “robust assessment” is one solidly built on a firm foundation. In fact no such foundation exists, the proposed changes to the Green Belt Boundary were never assessed on a site by site basis. Rather the Review assessed only wider parcels, which covered multiple sites, each with their differing qualities and issues. It was always inevitable that individual sites will have different impacts on the Green Belt purposes from those of the parcel as a whole of which they are but one part.

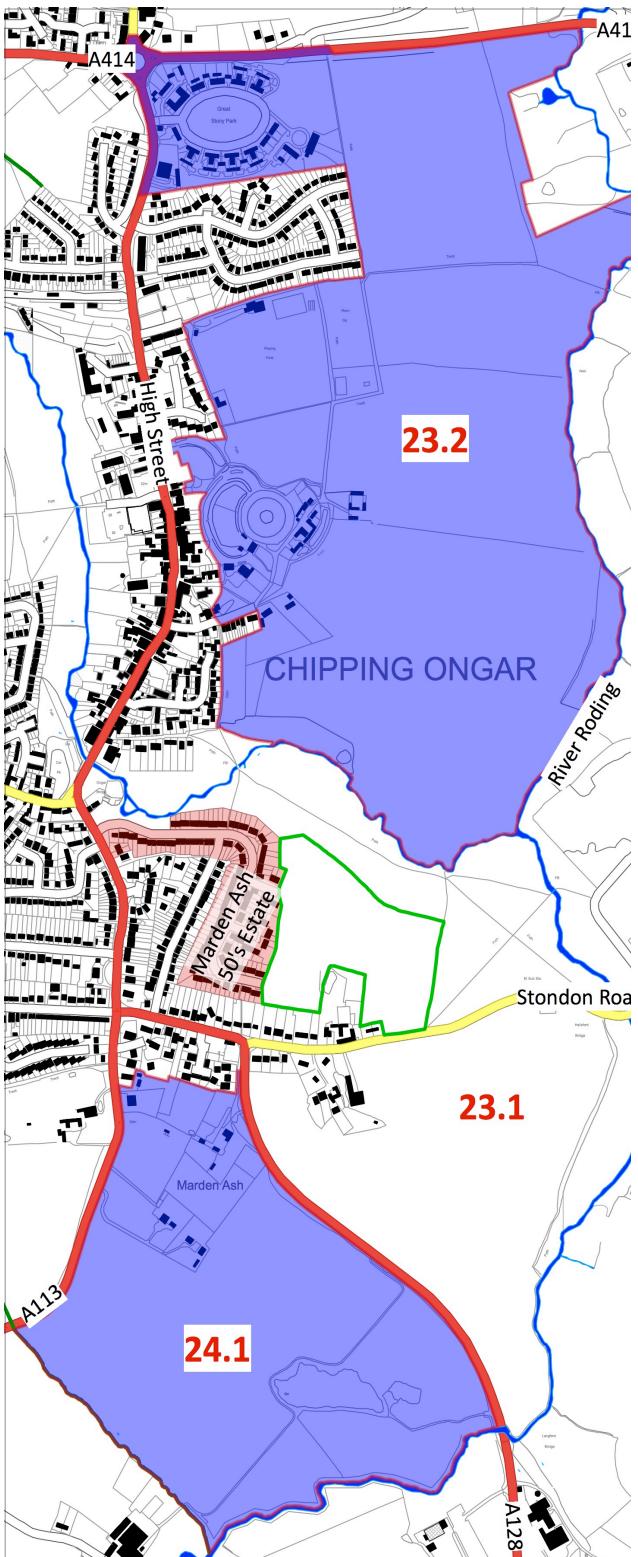
The stage 2 Green Belt Review was never error checked even when errors were repeatedly pointed out - as was the case with Omission site SR-0090 and many other sites. The lack of any corrections to this document is in itself an example of the lack of a robust approach.

In September 2015, EFDC published their draft Green Belt Review Stage 1. It was a strategic review, covering the entire district, which was broken into 61 large land parcels. The relevant ones around Ongar are: DSR-023 – East of Chipping Ongar and DSR-024 – West and South West of Chipping Ongar. The relevant extract from the stage 1 review is reproduced immediately below.



Moving on to the Stage 2 Review, the parcels DSR-23 and DSR-24 are broken down into sub-parcels. For instance, DSR-24.1, 24.2, 24.3 etc. However as far as we can see, uniquely in the whole Green Belt Review report, the sub parcels within DSR-23 are not numbered from .1, but begin at .2 – ie they are numbered 23.2, 23.3, 23.4. There is no designated 023.1 parcel.

For those not familiar with Ongar attached below is explanatory plan. The two parcels 23.2 and 24.1 assessed in the Stage 2 Green Belt Review are identified in blue, with the verbatim Green Belt description of those parcels taken from the study, adjoining. Parcel 023.1 is not described in the Stage 2 Review and so a relevant quote is taken from the Stage 1 Review.



### Parcel 23.2

"River Roding forms relatively strong boundaries to the south and east; A414 forms strong boundary to the north. Potential anomalies: None identified."

"The parcel is predominantly rural and free from development with the exception of the residential development at Great Stony Park in the north west of the parcel. The remainder of the parcel consists of open arable fields, allotments on the settlement edge, Chipping Ongar playground and recreation ground, and some individual detached properties with gardens. The Three Forests Way and St Peter's Way public rights of way cross through the parcel and Ongar Castle Scheduled Monument lies in the west of the parcel. The sloping valley sides and consequent visual connectivity

with the wider countryside to the east present a strong rural character."

### Parcel 023.1

#### **Not assessed in the Stage 2 Green Belt**

**Review.** Stage I Review states: "It is unlikely that the loss of openness from urbanising Green Belt land south of Stondon Road and east of the Marden Ash Estate would cause harm to the setting of the historic town and heritage assets, as the 1950's development provides a strong physical barrier."

### Parcel 024.1

"A113 forms strong boundary to the west; River Roding forms relatively strong boundary to the south; A128 forms strong boundary to the east. Potential anomalies: None identified. The parcel contains little development with the exception of some detached dwellings (primarily converted farms and barns) and back gardens in the north of the parcel adjacent to the southern settlement edge of Chipping Ongar and buildings at Gray's Farm in the west of the parcel. The outer parcel boundary is strongly defined by a stream and the River Roding along the south western and south eastern parcel boundaries."

In our view, it is obvious when reading the physical descriptions of the parcels in the report (as reproduced above), there is a missing parcel within the Stage 2 Review, comprising land between the A128 to the south/south west and the River Roding to the north. This missing parcel includes omission site SR-0090, shown outlined in green on the above plan and in more detail here.



Rather than correct the error of the complete omission in the Green Belt assessment of parcel 23.1, the Council erroneously assessed SR-0090 as if it were part of 023.2 in the 2016 and 2018 Site Selection Reports, asserting that therefore the parcel had unacceptable green belt impacts and should be rejected from the site selection process.

As a result, this error has had a direct impact on the outcome of the site selection process and therefore the conclusion that the Plan is justified (i.e. the ‘most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence’) is in doubt.

Whilst Green Belt is only one factor to be weighed in the balance, Local Authorities must, in establishing exceptional circumstances, ensure they choose the least damaging Green Belt options. Clearly without doubt this requirement is not satisfied.

We consider that if missing parcel 023.1 had been assessed in the Stage 2 Green Belt Review it would have been established that (in line with the findings of the Stage 1 review as quoted above) development in this location would not have been prohibitive to site SR-0090 being retained in the site selection process and being considered to be an appropriate location for development.

In the Nathaniel Litchfield's 2016 "*Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.*" SR-0090 was assessed with a better score than four of Ongar's Allocated sites. SR-0090 is a 'reasonable alternative' that has not been properly assessed.

This is just one of many examples of errors and omissions in the foundation work in this Plan. As such, it is not possible to conclude that the Green Belt Assessment process is robust, and the relative importance of the Green Belt around Ongar has not been correctly assessed through the Site Selection process.

**Question 5 Having regard to paragraph 85 of the NPPF, and to the potential for an increased level of housing need in the District to be identified in the future, how has the Council satisfied itself that Green Belt boundaries will not need to be altered at the end of the Plan period? Is it necessary to identify areas of safeguarded land between the urban area and the Green Belt?**

Epping Forest District Council's record of providing adequate housing for its own Community is unacceptable by any standards. The EFDC Housing Strategy 2017-22 revealed that not one affordable home was built in the District during 2016/17. The challenge of providing generally affordable housing has not been met, Epping Forest District Council amongst the ten non-Metropolitan Councils in the country with the least affordable housing as judged against price and incomes.

Paragraph 85 of the 2012 National Planning Policy Framework (NPPF) requires Councils to identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, to meet longer term development needs stretching well beyond the plan period;

The Aug 2016 Site Selection Methodology stated in para 4.1: "*Consideration will also need to be given to safeguarding land for the future in order to ensure the long term security of any new Green Belt boundary. Account will be taken of any future changes to the NPPF;*"

The 2016 EFDC Draft Local Plan included the following statement in para 3.97. "*Given the nature of the District, and the high proportion of Green Belt, it will also be necessary to identify land to be safeguarded to meet future development needs.....The hierarchical approach taken as part of the preparation of this Draft Local Plan has identified all reasonably available land outside of the Green Belt for development in the first instance. For future Plan periods further land within the existing settlements may become available, but it is considered likely that further development on land that is currently within the Green Belt will be required.*"

This statement was made before publication in September 2017 of the "Homes in the Right Places" consultation which demanded more housing in Districts such as Epping, this was reported to EFDC Council on 14<sup>th</sup> Dec 2017.

*"Alongside the consultation document DCLG have published the housing need figure for each local planning authority using this method on the basis of current data (average household growth for 2016-2026 and house price to earnings ratios for 2016). For Epping Forest District this has been calculated at an annual housing need requirement of 923 homes per annum compared with the Draft Local Plan figure of 514 homes per annum. Over the plan period from 2011-2033 this equates to the need to make provision for 20,306 new homes compared with 11,400 in the Local Plan Submission Version."*

The Submission Plan only identified the need for Safeguarded Land for the following:  
*“Future transport schemes. Protect petrol filling stations and car repairs/servicing sites.*  
*Protected species. Land for flood risk management. Areas of recreation and*  
*complementary wildlife habitats. Mineral Safeguarding Areas”*

There is no such safeguarded land for future housing. The Plan was pushed through the democratic process on the basis that if it was not agreed then EFDC would be immediately subject to the revised housing numbers proposed in the “Homes in the Right Places” consultation. This may have worked as far as the short term perspective of Epping Forest District Council is concerned but to suggest there is no foreseeable requirement for homes past 2033 and therefore no requirement to identify safeguarded land is not a credible position to take.