



Strategic Planning & Research Unit

For and on behalf of  
**Peer Group Plc**

**Epping Forest Local Plan Examination**  
Response to MIQ's Matter 5: Site Selection Methodology  
and the Viability of Site Allocations

**The Ongar Park Estate  
North Weald Bassett**

**Prepared by  
Strategic Planning Research Unit  
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Sheffield**

February 2019





Strategic Planning & Research Unit

Insert job number and site name  
on behalf of Peer Group Ltd

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## **1.0 MATTER 5: SITE SELECTION METHODOLOGY AND THE VIABILITY OF SITE ALLOCATIONS**

### ***Issue 1: Have the Plan's housing allocations been chosen on the basis of a robust assessment process?***

#### **1. The Council should provide a summary of the process by which the Plan's housing allocations were selected. In particular:**

##### **a. How was the initial pool of sites for assessment identified?**

- 1.1 It would appear though careful analytical exploration of the databases referred to by the Council that the final allocations have been selected for reasons outside of the evidence base.
- 1.2 Paragraphs 5.84 to 5.93 and P5 (K) of the submission Local Plan repeatedly makes quite clear that the Council's site selection policy in respect of North Weald Bassett is based upon the Allies and Morrison Master Plan Study 2014 (EB1003).
- 1.3 As stated at paragraph 5.86 of the submission Plan, that Study was "reported" to Cabinet in October 2014, but there is no record of the Council adopting any recommendation from that Study, particularly as a reason to adopt a strategic strategy or in respect of individual site allocations.
- 1.4 Allies and Morrison record at page 139 of their study that 160 people attended an "exhibition" on Saturday 28 June from 11.00am to 3.00pm. A&M state that 35 feedback forms were received and 9 written representations. By any measure, this is not "public consultation" and the sample of responses is very small.
- 1.5 The Council also relies on four key questions (pages 140 to 142 of the Study) where it invites the public to comment. Firstly, those questions are vague and open-ended and, secondly, the answers from the public, which the Council records at page 141, do not support development in any particular direction or location within the village.
- 1.6 Peer Group has formally requested from the Council and from Allies and Morrison a copy of the 35 feedback forms and the nine written representations. The Council has stated that these responses have all been lost or destroyed.
- 1.7 Therefore, the leap from the Allies and Morrison Master Plan Study to site allocations which are based on a public exhibition of that Study is manifestly flawed and does not comply with the NPPF or the requirements for an SA.
- 1.8 EB1003 page 143 states that some respondents identified a preferred option (indicating the level of development) within each scenario, with seven people voting explicitly for Scenario B, Option 1, making this the most popular approach. This is a development of just 500 dwellings to the north of NWB. It cannot be interpreted as support for the much larger proposal.
- 1.9 The vagueness of the questions (including how one might "feel" about development) and the fact that both Scenarios contained 3 options lead to confusing and conflicting responses with some suggesting both scenarios would work while others commenting on the level of growth in one scenario (as a negative point) but failing to make the same point about the quantum of growth on the alternative scenario. There is clearly support for development to the south as being a "Better distribution of housing" (answer to Q3 Scenario A).
- 1.10 Lastly there is considerable concern with regard to reliance on such a small number of

responses (35 forms and 9 written responses totalling 44) being used to determine the suitability or otherwise of planning policies and site allocations. The number of responses collected was far smaller than the number who are stated to have attended the exhibition (160 people) which might indicate the vast majority did not have convictions either way on terms of the level or direction of growth.

1.11 See the notes of a meeting between EFDC and Peer Group on 18 November 2016 – Appendix 1

**b. How was the Site Selection Methodology (SSM) utilised in the Site Selection Report 2018 (EB805) established and is it robust?**

1.12 As the Council has now formally confirmed that the Site Selection Report 2018 was part of the SA process in terms of the selection of reasonable alternatives then the Site Selection Methodology is required by law to be in accordance with the guidance and regulations governing SA's. This has certain procedural and methodological implications.

1.13 In procedural terms the whole of the SA should be complete at the time of submission. However, Regulation 35 (T&C Planning Regulations 2012) requires that documents are taken to be available when made available for inspection and published on the LPA website. Section 19 of the Planning and Compulsory Purchase Act deals with the "preparation" of local plan documents and, in particular Section 19 (5) requires the SA and a report of the findings of the SA to be undertaken. The SA was not complete and was not available for Inspection during Regulation 19 consultation. "Preparation" ends at the commencement of Regulation 19 because the Plan cannot be amended by the Council after Regulation 19. By the Council's own submissions, the SA was not complete and this remains a substantive unresolved issue for this examination.

1.14 In methodological terms the SA (and hence the site selection report 2018) is required to assess "reasonable alternatives" in order to comply with statute, regulations and guidance.

1.15 In brief the council have stated that all reasonable alternatives have been subject to a 32 point assessment in the site selection report (EB805i Appendix B.1.5.2) "Results for further testing" this is factually incorrect for while the Peer Group site is correctly identified (for the first time since the original Master Plan EB1003) as SR-0269A-N in EB805A page (B24 the site selection report 2018) this is not subject to the 32 point assessment in (EB805i Appendix B.1.5.2). Instead the Golf Course SR-0310 which was not identified though the Master Planning process as a suitable or sustainable development options was assessed. The golf course is a much larger site capable of delivering some 2,077 dwellings on 70 hectares (see North Weald Bassett, Blakes Golf Course (East Area) (SR-0310 B801Gxi-A-B1.4.2. page 28)). Peer Group has never advanced or promoted SR-0310 for development.

1.16 If site SR-0269A-N had been assessed, it would have scored extremely well against the 32 points of assessment as illustrated by the table in Appendix 1 of this response.

1.17 Peer Group have consistently raised the issue of the need for the Council to assess the correct site during the production of the plan including at the meeting referred to earlier in the examination as evidenced in Appendix 2.

1.18 The failure to consider reasonable alternatives in the SA is important because the Site Selection Report has been confirmed by the Council (at the Examination Hearing on 12 February 2019) to be "embodied in the SA" and in this case the UK authorities on reasonable alternatives are as follows:

- a. St Albans v. Secretary of State [2010] JPL 70
  - b. Save Historic Newmarket v Forest Heath DC [2011] JPL 1233
  - c. Heard v. Broadland DC [2012] Env LR 23
  - d. R (Buckinghamshire CC) v Secretary of State for Transport [2013] EWHC 481 (Admin) (HS2) Ouseley J. who found breach of alternatives duty. Court of Appeal agreed [2013] P.T.S.R. 1194 at [72] and [183]-[185]. Not raised in Supreme Court.
  - e. Ashdown Forest Economic Development LLP v Secretary of State [2014] EWHC 406 (first instance) – wide judgment
  - f. Cogent Land LLP v Rochford DC [2013] JPL 170
  - g. No Adastral New Town v. Suffolk Coastal DC [2015] Env. L.R. 28
  - h. R. (Friends of the Earth Ltd) v Welsh Ministers [2016] Env. L.R. 1
  - i. R. (RLT Built Environment Ltd) v Cornwall Council [2017] JPL 37
- 1.19 Further guidance is set out in the Commission Guidance at 5.13 and 5.14 and UK Guidance Section 5 this highlights:
- a. Duty to consider alternative which would secure the objectives of the plan or programme proposed within that plan or programme
  - b. Not legitimate to select alternatives which have obviously more significant adverse effects than the plan or programme as proposed in a bid to promote the latter.
  - c. Consider both positive and negative effects.
- 1.20 In terms of the above cases the following can be concluded
- a. St Albans – failure to consider alternatives to late modification
  - b. Newmarket – failure in the final report to consider any alternatives to changing housing position and no summary or reference back in the ER to the options process considered earlier
  - c. Heard – Broadland DC and South Norfolk DC JCS unlawful because the SEA undertaken did not explain (i) which reasonable alternatives to urban growth had been selected for examination and why; and (ii) it had not examined reasonable alternatives in the same depth as the preferred option.
  - d. Reasons must be given for both (i) the selection of alternatives for assessment, and (ii) the selection of a preferred option.
  - e. Save Historic Newmarket Ltd.
    - i. Paragraphs [16]-[17], [40] - alternatives can be sifted out as the draft goes through successive iterations without the need to re-examine at each stage but must give reasons in the report for their rejection, and where the reasoning had been given at earlier stages the ER accompanying the final draft must at least summarise that reasoning. No “paper-chase” (see Commission Guidance)
    - ii. As to the reasons for preferring the proposed plan as adopted: the proposition that a “prior ruling out of alternatives” may legitimately take place during the iterative process is subject to:

*“the important proviso that reasons have been given for the rejection of the alternatives, that those reasons are still valid if there has been any change in the proposals in the draft plan or any other material change of circumstances and that the consultees are able, whether by reference to the part of the earlier assessment giving the reasons or by summary of those reasons or, if necessary by repeating them, to know from the assessment accompanying the draft plan what those reasons are“:*

iii. Heard –

1. Obvious non-starters could be ruled out [66] but outline of reasons for the selection of alternatives is required and alternatives have to be assessed.
2. There must be “a reasoned evaluative process of the environmental impact of plans or proposals” and the SEAD requires an outline of the reasons for selection of a preferred option even where alternatives also still being considered. Where only one option is under consideration, reasons must be given for that also [70]
3. alternative objectives do not have to be assessed; the focus of SEA is alternative ways of meeting those objectives

1.21 The situation here is that the Peer Group site, in the latest version of the site selection report, has screened out sites including SR-0269A-N in EB805A page (B24 of the site selection report 2018) on the basis of the “less preferred strategic option” and a summary is provided on page B759 of EB805i Appendix B.1.5.2 for the rejection of the strategic area “Southern Expansion”. That summary is not an evidence based assessment of “reasonable alternatives” and it does not consider the site promoted by Peer Group.

1.22 In terms of the approach required by the SA this site selection methodology fails for the following reasons:

- a. The Site Selection Report 2018 (and hence the SA) has not considered all reasonable alternatives – it only considered three large strategic areas, North, South and South West. The Allies and Morrison Master Plan (EB1003) proposals for meeting the different levels of housing was approved as part of the evidence base for the plan and represented a fourth alternative that was not considered by the SA in the Site Selection Report 2018. That fourth “Reasonable Alternative” is the development of the settlement with development to both the North and South of NWB as a way of meeting the required level of housing (see Chapter 7 – Viability and Options Testing page 135 where all 3 options presented have varying levels of development proposed for site as SR-0269A-N). This Allies and Morrison option has not been considered in the SA (as is made clear in The Site Selection Report 2018) on page B759 of EB805i Appendix B.1.5.2.
- b. The assessment of much larger tracts of land in the Site Selection Report 2018 is not an appropriate way of discounting smaller sites in the same area.** In the case of NWB the larger areas considered were North, South and South West but the smaller site was identified in the Master Plan (EB1003) SR-0269A-N as a reasonable alternative to assist in meeting the proposed level of development and it should have been assessed as a reasonable alternative to other smaller sites which make up the proposed site allocations to the North. **The approach of The Site Selection Report 2018 using much larger sites**



**that are required to meet development needs appears contrary to Commission Guidance at 5.13 and 5.14 and UK Guidance Section 5**

- c. **The sites in the Site Selection Report 2018 (and hence the SA) has not been undertaken on a consistent basis.** Given that the sites to the North of NWB have been assessed individually in the SA (as much smaller parcels) the same approach has not been adopted for the sites to the South i.e. an assessment of the smaller sites in the same way that had been undertaken to the North **this “dual approach” is unlawful Heard – Broadland DC and South Norfolk DC**
- d. **The Site Selection Report 2018 (and hence the SA) should have reassessed alternatives once the scale of development changed.** The scale of development being considered at different locations varied over the production of the plan with early work considering the impact of large scale land releases and these assessments should have been revisited once the lower level of development was being considered. In the case of NWB the level of development being assessed in the earlier Site Selection Report to the South was some 3,950 dwellings on almost 120 hectares at Ongar Park Estate, North Weald Bassett (SR-0269A of B801Gxi-A-B1.4.2. page 24 of web document) and 2,077 dwellings on 70 hectares at North Weald Bassett, Blakes Golf Course (East Area) (SR-0310 B801Gxi-A-B1.4.2 (being a total of 190 hectares for over 6,000 dwellings) page 28 of web document). **This approach of assessing a very significantly larger area in order to discount smaller reasonable alternatives is contrary to the judgements of Save Historic Newmarket and Heard – Broadland DC and South Norfolk DC (para 69 - 71)**

- 1.23 It is clear that the Allies and Morrison Master Plan (EB1003) option B with allocations to the North and South of NWB has not been considered. Therefore, the site selection report 2018 and the SA fails against the legal requirements of the SA process.
- 1.24 It is our view that by considering the impact of the larger areas of land for a much larger scale of development the SA is contrary to Commission Guidance at 5.13 and 5.14 and UK Guidance Section 5.
- 1.25 It would also appear to be the case that when it became clear (if it wasn't clear at the start of the site selection process) that a much smaller level of development was proposed in certain locations such as NWB then the reasons for rejecting the larger areas should have been revisited to establish if the smaller areas possessed the same character.
- 1.26 Having reviewed the Site Selection Study in light of the council's confirmation that it is part of the SA we reach the conclusion that the methodology in the Site Selection Process is not only unsound but clearly contrary to both the regulations and guidance relating to the SA of which it forms part.
- 1.27 In terms of the Site Selection Report 2018 and the associated SA some of the critical evidence for the selection of Northern Expansion (page B759 of EB805i Appendix B.1.5.2) is inaccurate or misleading in terms of its relevance to the actual sites that are being promoted in this location. Likewise, the evidence/justification for the choice of the northern expansion is also inaccurate, incomplete and misleading (see Appendix 3 for detail) .
- 1.28 These failings together with the incomplete nature of the SA at the time of preparation and submission lead us to recommend that the examination be terminated and the

submitted Local Plan withdrawn. It should not be found either legally compliant or sound.

**c. What is the relationship between the SSM and the sequential approach To site selection set out in Policy SP2(A)?**

- 1.29 The SSM does not appear to follow the sequential approach to site selection for sites such as SR-0269A-N which according to Natural England's Agricultural Land Classification Map, is 'Non-Agricultural Land' being part golf course and the majority of the site being the former Marconi Radio Station. The Council set out its sequential approach to site allocations in paragraph 3.54 of the draft Plan (Regulation 18) and again at SP2 of the submission Local Plan, but the Council has not followed that sequential approach in North Weald Bassett or explained why it has not followed that approach.
- 1.30 According to part (v) of SP 2 sites such as the Peer Group site, which is previously developed land within the Green Belt, of least value to the green belt (part vi) and of no agricultural land quality (part vii) should be sequentially preferred to the greenfield BMV agricultural land to the north of NWB.
- 1.31 This is the conclusion reached in the Allies and Morrison Master Plan (EB1003 Chapter 7 (page 135) Viability and Options Testing) which includes the Peer Group site in options 1 (in part) and then fully in options 2 and 3.
- 1.32 The Allies and Morrison Master Plan study does not appear on the Council's evidence base as a Site Selection document but instead is listed under "Places". However, paragraphs 5.84 to 5.92 of the submitted Local Plan make repeated reference to the Allies and Morrison Master Plan study as the foundation for its site allocations in North Weald Bassett. Policy P6 (K) of the submitted Local Plan states that Development proposals must comply with the Strategic Master Plan for the North Weald Bassett area which has been formally endorsed by the Council. We can find no evidence of any formal endorsement of the Allies and Morrison Master Plan or any consideration of the reasonable alternatives within, or to, that Master Plan.
- 1.33 The reasons why this master plan as not been correctly translated into the submitted plan, is partly due to the inaccuracy of reporting the results of the evidence base but secondly because the approach in EB805AK is substantively different from the approach in policy SP 2 not least because it allegedly incorporates the input of both officers and Members (paragraphs 4.21, 4.28 SSM EB805AK) which is undocumented. This lack of recording and hence transparency of these vital decisions in the site selection process render the SSM and hence the SA unsound.
- 1.34 Stage 1 of the SSM does refer to flood risk part ii) of the sequential approach but other constraints considered in stage 1 are not reflected in policy SP 2.
- 1.35 Stage 2 of the SMM conflates a number of considerations and there is no sequential approach as clearly set out in SP 2. This stage also incorporates a workshop with officers and other consultees although there has been no evidence produced as to the outcome of these meetings or the decisions that were made in them.
- 1.36 Stage 3 identifies "preferred sites" but the SSM **provides no material insight** into how this decision is reached. Paragraph 4,25 refers to appendix A and the RAG system, but this appendix just sets out the tables and does not apply it to the "Reasonable Alternatives".
- 1.37 While paragraph 4.26 includes the approach to identify preferred sites paragraph 4.28 makes it clear that the resulting "preferred sites" were generated by an officers working



party which was then subject to further influence of members via another undocumented workshop (paragraph 4.30).

- 1.38 What is completely unclear from the SSM process is how decisions are being made, For example the Peer Group site is correctly identified (for the first time since the original Master Plan EB1003) as SR-0269A-N in EB805A page (B24 the site selection report 2018). The Site is then immediately discounted for the following reason:

*“Site is entirely or partially unconstrained by Major Policy constraints. Site is located entirely within a less suitable strategic option and therefore did not progress to Stage 6.2. See Appendix B.1.5.2 for further detail”.*

- 1.39 There is no evidence to explain or support the definition of a “less suitable strategic option”. Even if such evidence existed, it would be subject to justification and to the SA requirement to test reasonable alternatives. That has not been done.

- 1.40 It is wholly unacceptable to reject suitable and sustainable sites within a settlement on the grounds that it is part of a much larger parcel of land, which might, or might not, be suitable for development. The Peer Group site is immediately adjacent to the existing settlement boundary, it was found by Allies and Morrison to be amongst the most favourable and suitable sites in North Weald Bassett and it was then rejected by the Council officers, without any site assessment or any comparison to other sites (many of which are far less suitable and sustainable than the Peer Group site) in North Weald Bassett.

- 1.41 The definition of preferred and non-preferred sites does not appear to have been undertaken in terms of the sequential approach in SP 2 or as set out in paragraph 4.26 of the SSM (EB805AK), firstly because sites are being rejected not due to how they are performing sequential against these criteria but on the grounds of how much larger areas of land are considered to perform against an undefined and untested criteria.

- 1.42 This is not a sound approach as it is not possible to determine from the evidence base that the most appropriate (or even a rational) strategy is being pursued.

**d. What was the role of the Sustainability Appraisal in selecting between the various sites?**

- 1.43 As explained above the Site Selection Methodology was used to to discount many reasonable alternative sites prior to their potential consideration in the SA.

- 1.44 The Council has confirmed that the SA was not complete prior to or at any time during the Regulation 19 consultation. The SA could not therefore inform site selections or reasonable alternatives.

- 1.45 The site selection report 2018 was published after the submission of the plan and the SA and as such the the role of the site selection report is to justify the decision already taken and published in the submission version of the plan.

**e. Was any other evidence taken into account in the site selection Process? In particular, how has the historic environment been taken into account? Have Historic Impact Assessments been undertaken as Recommended by Historic England and, if not, is this necessary?**

- 2. How were the conclusions reached about individual sites checked for accuracy and consistency? Were sites visited or were they assessed through a desktop process? What has been done to check the**

**assessments in specific cases where their accuracy has been challenged  
e.g. Site SR-0596? (Reps19LAD0012).**

- 1.46 There are a number of serious inaccuracies and omissions in the site selection process that have built upon each other resulting in a seriously flawed Site Selection Report 2018. A number of these failings were repeatedly drawn to the attention of the Council and, in particular, highlighted to the Council in the Peer Group Regulation 18 submission.
- 1.47 For example, the justification for not selecting any growth to the South of NWB is set out in summary as follows:
- 1.48 The Council assesses site SR-0310 as 70.65 hectares for 2,077 dwellings at EB805Fiii. That site has never been promoted by Peer Group.
- 1.49 While the Peer Group site (15 hectares for 285 dwellings) is correctly identified (for the first time since the original Master Plan EB1003) as SR-0269A-N in EB805A page (B24 the site selection report 2018). This much smaller site is immediately discounted from any further assessment for the following reason:
- “Site is entirely or partially unconstrained by Major Policy constraints. Site is located entirely within a less suitable strategic option and therefore did not progress to Stage 6.2. See Appendix B.1.5.2 for further detail”*
- 1.50 This can be cross referenced to EB805AJ appendix B1.3 page 155 which identifies the correct smaller site and on page B157 the site is assessed as passing the first stage but not the second again stating:
- “Site is located entirely within a less suitable strategic option and will not progress to Stage 6.2.”*
- 1.51 However, turning to the reference given for the rejection of the site (EB805i Appendix B.1.5.2) “Results of sites for further testing” page B758 does not identify the correct site. Instead it identifies the Blakes Golf Course SR-0310 (a much larger site capable of delivering some 2,077 dwellings on 70 hectares (see North Weald Bassett, Blakes Golf Course (East Area) (SR-0310 in B801Gxi-A-B1.4.2. EB805Fii Appendix B1.4.2 Results of Stage 2 and Stage 6.2 Assessment Part 3 page 28)). This larger site (which only contains a much smaller element of the proposed site SR-0269A-N) is again rejected for the following reason:
- “This site falls within a strategic option which was considered to be less suitable.”*
- 1.52 Despite this paper chase though site Selection Report there is no explanation or justification for the rejection of the Peer Group site in its own terms.
- 1.53 Your question **“How were the conclusions reached about individual sites”** prompts a simple answer. In the case of the Peer Group site SR-0269A-N it simply was not considered and no conclusion was ever reached.

**3. As raised in Matter 1, Issue 2, some sites which were proposed for allocation in the Regulation 18 version of the Plan are not proposed in the Regulation 19/submitted version and vice versa. Is this due to changes in the site selection process, or something else? Are the different conclusions reached about the relevant sites fully explained and justified?**

- 1.54 Site selection at Regulation 18 was not based on evidence, was not rational, was not justified and, in the case of the Peer Group site, the Council’s assessment was in

respect of a site of 190 hectares for over 6,000 new homes. The site advanced by Peer Group was, in fact, for 15 hectares and 285 new homes. Regulation 18 was therefore fundamentally prejudicial to the Peer Group site.

- 1.55 It is our understanding that some of the allocated sites at the Regulation 18 stage have been excluded on the same basis as land to the south of NWB by the use of the “less suitable strategic option” thereby dismissing sites which are reasonable alternatives from the assessment on the basis of the potential impact of development over a much wider area than that which is being proposed.
4. **Having regard to Question 1c above, is the sequential approach to site allocation set out in Policy SP2(A) justified, particularly in respect of the value placed upon open spaces within settlements? How was the adequacy of remaining open space within a settlement measured (Policy SP2(A)(iv))?**
  5. **Now that the site selection process is complete for the purpose of making allocations in the Plan, is it necessary to include the sequential approach within Policy SP2(A)?**
  6. **Is it justified to allocate station car parks (EPP.R3; LOU.R1, LOU.R2; BUCK.R2; THYB.R2) and other car parks (EPP.R6, EPP.R7) for housing? Can adequate parking for both commuters and residents be provided; and how will short-term disruption to commuter parking during the construction phase be addressed?**

***Issue 2: Have the Plan’s allocations for Gypsies & Travellers and Travelling Showpeople been chosen on the basis of a robust assessment process?***

1. **The Council should provide a summary of the process by which the Plan’s allocations for Gypsies & Travellers and Travelling Showpeople were selected. In particular:**
  - a. **How was the initial pool of sites for assessment identified?**
  - b. **How was the Traveller Site Selection Methodology (TSSM) utilised in the Site Selection Report 2018 (EB805) established and is it robust? Is it consistent with national policy in the Planning Policy for Traveller Sites?**
  - c. **What is the relationship between the TSSM and the sequential approach to site selection set out in Policy SP2(D)?**
  - d. **What was the role of the Sustainability Appraisal in selecting between the various sites?**
  - e. **Was any other evidence/factors taken into account in the site selection process?**
2. **Is the sequential approach to delivering accommodation for Gypsies & Travellers and Travelling Showpeople justified in respect of the following issues in particular:**
  - a. **How have the benefits of seeking to regularise existing unauthorised**

**sites and sites with temporary permission been weighed against the potential harms, including to the countryside and Green Belt? Will this lead to the concentration of Traveller sites in certain areas, such as Roydon?**

- b. Is it justified to prioritise the provision of new sites in the countryside and Green Belt over making provision as part of the development of other allocated sites?**

***Issue 3: Have the Plan's new employment allocations been chosen on the basis of a robust assessment process?***

- 1. How were the five new employment site allocations chosen from the alternatives indicated to be suitable in the Employment Land Supply Assessment?**

#### **Viability**

***Issue 4: At the broad strategic level, are the Plan's allocations financially viable?***

- 1. Having regard to paragraph 173 of the NPPF, are the Plan's allocations for housing (including for Travellers) and employment financially viable, having regard to the normal cost of development and mitigation; and all relevant policy costs, including for affordable housing, space standards, building requirements, design and potential infrastructure contributions?**



Strategic Planning & Research Unit

Insert job number and site name  
on behalf of Peer Group Ltd

## **APPENDIX 1: MEETING NOTE IN REFERENCE TO SITE SELECTION**

## **File Note**

### **Meeting with Epping Forest District Council – 18 November 2016**

#### **Draft Local Plan – Regulation 18 Consultation**

#### **Present:**

**Chloe Salisbury – Arup on behalf of Epping Forest District Council**

**Maria Solovieva – Planning Officer - Epping Forest District Council**

**Michael Calder – Phase 2 Planning on behalf of Peer Group**

**Alan Perkins – On behalf of Peer Group**

#### **For part of meeting only:**

**Alison Blom-Cooper – Fortismere Associates on behalf of Epping Forest District Council**

1. Ms Chloe Salisbury (CS) opened the meeting by presenting a “Site Pro-forma for developer meetings for sites not proposed for allocation” (copy attached to this file note).
2. The site pro-forma identified the two sites which CS advised was the land which had been assessed by the Council, but which had not been allocated and was not therefore part of the Regulation 18 consultation. The sites were shown on the “Site Proforma” as the whole of SR-02069A and SR-0269B.
3. Michael Calder (MC) informed CS that these were not the sites being advanced by Peer Group, which might explain why the Council had not allocated these sites.
4. CS referred to the Arup Site Selection Report Stage 2 Assessment in North Weald dated September 2016 which showed site SR-0269A.
5. AP queried if SR-0269B was to the south of the railway line. CS confirmed that this was the case.
6. MC stated that Peer Group has never promoted any land to the south of the railway, such that SR-0269B was of no relevance to our discussions.
7. MC explained that the two sites on the Arup Report Stage 2 Assessment that were relevant are SR-0269A and SR-0310 but it was important to recognise that only a small proportion of those two SHLAA sites were actually being advanced for development. MC referred to the Site Appraisal prepared by Omega on behalf of Peer Group and Bovis Homes (which MC confirmed had been submitted to the Council in July 2016) and used the aerial photograph on the



front cover of that report to show the land promoted for development, which is edged in red.

8. MC said that the development sites were consistent with the Allies and Morrison Master Plan Study dated September 2014.
9. MC explained that from the sites shown on the Site Pro-forma presented today by the Council, only SR-0269A (not SR-0269B) was contained in the Arup Site Selection Report dated September 2016 and that site alone comprised 120ha (300 acres). However, the land on SR-0269A that was actually being advanced for development by Peer Group comprises just 7.4ha (18 acres) in total. In addition, the adjacent site number SR-0310 (which is also owned by Peer Group), was also assessed by Arup and that site comprises 70ha (175 acres), whereas only 7.8ha (19 acres) has been promoted for development.
10. MC then referred to the assessment of the land on page 2 of the Site Pro-forma, where it was stated at paragraph 4.2 (Impact on agricultural land) that *“Development would involve the loss of the best and most versatile agricultural land (grades 1-3)”*. MC confirmed that all of the land being advanced for development was classified by Defra as “Non-Agricultural Land”.
11. CS acknowledged that the Council had misunderstood the land that was being advanced for development.
12. CS then referred to the Allies and Morrison Master planning Study dated September 2014 where the Council had decided, based on that study, that the Council’s preferred distribution of growth was Scenario B, which did not include any development to the south of North Weald.
13. MC referred to paragraph 5.105 of the draft Local Plan consultation document where it is stated that, *“Feedback received to the consultation on the proposals contained in the North Weald Bassett Masterplanning Study included: Scenario B (with no growth to the south was identified as the preferred approach for new development in the village”*. This was then repeated in the Residential sites – spatial options on page 153 of the draft Local Plan, where it said, *“Expansion of settlement boundary to the south – This option would represent an unsustainable pattern of settlement growth beyond its existing rectilinear edge, constituting sprawl. Growth in this direction was not supported as part of the North Weald Bassett Masterplanning study”*.
14. SC confirmed that this was the Council’s position, based on the public opinion expressed at a community exhibition held in June 2014, in the preparation of the North Weald Bassett Masterplanning Study.

15. MC explained to SC that, from evidence in the A&M study (section 8 page 139), just 160 persons had attended that community exhibition of which only 35 had completed feedback forms. From those 35, the Summary of Findings (page 143) stated that 7 people had supported Scenario B Option 1, making this the most popular approach. However, MC stated that Scenario B Option 1, which comprised 463 new dwellings to the northwest of the settlement, was not the housing distribution which had been chosen by the Council. The Council had chosen a distribution similar to Scenario B Option 3, but with some significant amendments. This was clearly not a distribution strategy that was supported by the persons who had attended the community exhibition.
16. MC also reminded SC that only 160 people from the whole community of North Weald had attended the community exhibition and that to take into consideration only 20 responses from those persons was not a sound basis for making major planning decisions.
17. AP asked SC what else the Council had taken into consideration in making its decision to locate all of the proposed new housing to the north and west of the existing village and what evidence supported that decision.
18. SC replied that the Council wanted to maintain the rectilinear settlement pattern of North Weald and that a range of planning considerations were taken into account, as explained in the A&M study in September 2014.
19. AP said that he was unable to identify that range of planning considerations in the A&M study and asked SC to identify where that evidence was presented in the A&M study.
20. SC replied that she was not involved when the A&M study was undertaken so she was unable to provide any further information.
21. At this point in the meeting, Ms Alison Blom-Cooper (AB-C), Epping Forest Planning Policy Officer, joined our meeting.
22. AB-C said that the Council had taken into consideration the impact on the Green Belt of development to the south of the village. The Council therefore felt that development to the north of the village would be better.
23. MC queried that outcome and made reference to the Council's own Stage 2 Green Belt assessment, which had found the land to the south of the village to be less sensitive than land to the north of the village.

24. AB-C said that she hadn't looked in detail at the Stage 2 Green Belt assessment, so she could not comment further, but the community consultations in 2014 had preferred to develop the land to the north of the village.
25. AP asked AB-C how the Council had moved from a position where, from only seven persons supporting Scenario B Option 1, it had now decided to locate all new housing to the north of the village.
26. AB-C said that this was the purpose of the current Regulation 18 consultation, to give the public a chance to respond to the Council's decision.
27. AP asked, if the Council wanted to gauge public opinion about whether to develop new housing to the north or the south, or both, surely it should have included in this consultation the sites identified in the A&M study to the south of the village as shown in Scenario A Option 1, 2 and 3.
28. AB-C replied that the sites had gone through a site selection process which had confirmed that only sites to the north of the village should be considered.
29. AP stated that, if the Council only consulted with the public in respect of sites to the north and west of the village, then in all probability, the public would only respond with comments concerning those sites. As such, the sites to the south and east of the village were not part of this public consultation.
30. AB-C replied that the sites to the south and east were disregarded at the "options stage" after a decision by Cabinet two years ago.
31. AP asked AB-C what were the reasons in the officer report to that Cabinet meeting which led to the decision of Cabinet.
32. AB-C replied that she could not remember, but the report to that meeting will be available on-line. She said that this was a member decision.
33. AP asked if the member decision was consistent with the officer report and if that report had been based on evidence?
34. AB-C replied that the members had their own views and would have taken their own soundings before making their decision.
35. AP said that, whilst the members were there to make decision, if those important decisions departed from officer recommendations or the evidence presented, it would be necessary for the members to provide reasons for doing so.

36. AB-C confirmed that the members were guided by the A&M study which supported Scenario B, not Scenario A.
37. AP said that if the A&M study informed the decision to adopt Scenario B over Scenario A, he could not find the evidence in that study to support that decision.
38. AB-C simply responded that AP was “entitled to his view”.
39. AP said that he was trying to explore with AB-C why his interpretation of the findings in the A&M study were different from the Council’s interpretation of that study.
40. AB-C replied that she had already explained that it was the Green Belt study in the A&M study and the setting of the redoubt that was material.
41. MC acknowledged that there were comments in the A&M study regarding Green Belt, but these would have been based on the very large areas in the SHLAA sites and were superseded by the Stage 2 Green Belt Review.
42. AB-C said that the A&M study was not superseded by the Stage 2 Green Belt Review, it was just a matter of different opinions.
43. AP suggested that we should look at the evolution of the two Scenarios, starting with Scenario A, where option 1 identified land coloured red to both the north and south of the village in order to achieve 458 dwellings. It was reasonable to assume that, if that were to be the total housing delivery for North Weald, these were the best sites. Option 2 introduced additional sites to the north and south of the village, which are coloured orange, in order to achieve a housing delivery of 1021 dwellings. Again, at that number of dwellings, it was reasonable to assume that A&M were identifying the next layer of the best sites to achieve that objective. Finally, at Option 3, additional sites, coloured yellow, which are all to the north of the village were introduced in order to deliver 1540 new dwellings.
44. In contrast, Scenario B starts from the premise that only sites to the north of the village should be selected, such that the sites to the south, coloured red (most suitable) and orange (next layer of most suitable sites) were simply disregarded.
45. AB-C disagreed. She said this was about “place-making” not about which sites might be more suitable.
46. AP then asked AB-C to look at the questions that were asked of the public in the A&M study at page 141, relating specifically to the two scenarios. Question 2 asked, “*How do you feel about Scenario B*”

*(no growth to the south-east of the settlement)?*". The responses to that very high level question were generally negative, in particular that:

- The distribution of housing would be uneven.
- Insufficient distribution of the development, too concentrated to one side of the High Road.
- Too much concentration in proposed area.
- Links with existing commercial development but noise could be an issue.

47. Question 3 asked, *"How do you feel about Scenario A (growth to the south of the settlement)?"*. This question did not explain that development would be to the north and south of the settlement or that the overall amount of housing would remain the same in both Scenario A and B. This led to a negative response that the scale of development was too large for the village (which would apply equally to Scenario B). However, there was a clear public statement that Scenario A would provide a *"Better distribution of housing"*.
48. AP stated that, in his opinion, the responses to questions 2 and 3 gave more negative responses to Scenario B than to Scenario A and, in particular, the public had considered Scenario A to provide a better distribution of housing.
49. AB-C responded that the reference to better distribution of housing might only have been one comment made by one person, so it was not necessarily relevant.
50. AP explained that, without having any information about how many people provided the answers to each of the questions in the A&M study, it was not possible to make that judgment. However, it was clear that better housing distribution should be a key factor in the "settlement pattern" and "place-making".
51. AB-C replied that the Council did not ask the community about the best distribution of housing, so she repeated that this was probably just one comment from one person.
52. AP asked if the questionnaires are available for inspection?
53. AB-C responded that she was not sure whether or not the Council had them because Allies and Morrison undertook the survey.
54. AP stated that there was little or no difference between the public "feeling" towards Scenario A or B but, on balance, public opinion appeared to be more positive towards Scenario A.

55. AB-C said that the questions were only a part of the study, so it was the study as a whole that was taken into consideration by the Council. The Council then decided that Scenario B was the best.
56. MC referred to the Summary of Findings on page 143 of the A&M study, which says, "*Feedback from the options exhibition suggests that Scenario B (with no growth to the south of the settlement) is the preferred approach for any new development in the area*".
57. MC said that this is the only time that statement was made anywhere in the A&M study. AB-C agreed.
58. MC said that, in that case, it was that single statement which now prevents potential sites to the south of the village being considered as part of the Regulation 18 consultation.
59. AB-C said the decision to exclude sites to the south of the village was made by members at a Cabinet meeting.
60. AP asked AB-C again to identify the evidence which the Council had relied upon to reach its decision to prefer Scenario B at that Cabinet meeting. He said we would be happy to debate differences of opinion in respect of that evidence, but he could not find the evidence.
61. AB-C replied that the evidence is the Allies and Morrison study.
62. AP stated that, as the current consultation is being conducted under Regulation 18, it would have been better to include the sites identified by A&M to the south and east of the settlement so the public would be able to comment on those sites.
63. AB-C replied that the public had been consulted at the "issues and options" stage of public consultation.
64. SC stated that there was nothing to stop the public from commenting on sites which had been omitted from the draft Local Plan during this consultation.
65. AB-C said that if we make these representations to the Council, it will look at its decision again but for present purposes the Council has made its decision.
66. MC reminded AB-C that the sites which appear to have been considered by the Council at Issues and Options stage were for 120ha and 70 ha comprising 1,200 dwellings. This was plainly not the sites or the scale of development which is being advanced now.



67. AB-C said that this would relate to the SHLAA assessment of the sites because the Council was unaware of the smaller development areas being advanced (by Peer Group) now.
68. MC replied that he could assure AB-C that the Council was in full possession of the proposed development sites when the SHLAA assessment occurred. MC confirmed that the information had been submitted to Amanda Thorn at Epping Forest District Council and to ARUP in response to their call for sites questionnaire in July 2016
69. SC stated that it had not been necessary to show the reduced area of the sites because the Council had not selected those sites.
70. AB-C confirmed that SC was correct, it did not matter that the proposed sites to the south and east of village had been reduced in scale because that was not the Council's preferred location for housing.
71. AB-C said that if we submit our comments to the Council, the Council will look again at the sites but, unless the Council receives "overwhelming" public opinion to support development to the south and east of the settlement, the Council would not be likely to change its position.
72. AP asked AB-C if site allocations were being driven by public opinion.
73. AB-C said that if the public came back to overwhelmingly support development of new housing to the south of the village, then the Council would look at that option again.
74. AP stated that, as the Council had not asked that question in the public consultation documents, it was improbable that the public would make such comments.
75. AB-C said that the Council was taking the same approach to Regulation 18 consultation in all of the settlements in the district.
76. SC stated that we should make our representations to the Council under the Regulation 18 consultation and the Council would consider those representations.

**Post Meeting Note:**

The 3<sup>rd</sup> page of the “Site Proforma for sites not proposed for development” confirms that the site was found to be “*suitable, available and achievable*” in the Strategic Land Availability Assessment 2016, but then rejected based on an area of 119.39ha with a capacity for 3,941 dwellings. It confirms that no “Developer Survey” was issued to the landowner and it confirms that “*No amendment was made to the site boundary during the site selection process*”.

Alan W D Perkins FRICS  
18 November 2016

**APPENDIX 2: SPRU ASSESSMENT OF PEER GROUP SITE (SR0269N) AGAINST CRITERIA UTILISED BY EB805I APPENDIX B.1.5.2**

Criteria	Score		Qualitative Assessment
1.1 Impact on internationally protected sites	0	Effects of allocating site for the proposed use do not undermine conservation objectives (alone in combination with other sites).	
1.2 Impact on nationally protected sites	0	Based on the impact risk zones there is no requirement to consult natural England because the proposed development is unlikely to pose a risk to SSS's	
1.3a Impact on ancient woodland	0	Site is not located within or adjacent to Ancient Woodland	
1.3b Impact on Ancient / Veteran Trees outside of Ancient Woodland	0	No Ancient or Veteran trees are located within the site.	Reynkyn Wood lies to the north east of the Site but is well beyond the 15m buffer, which is the standing advice of both the Forestry Commission and Natural England. In between the Site and Reynkyn Wood are built features including development on the A414, The Talbot, Marconi Cottages, dwellings to the north side of A414 (nos 277 and 279), part of the industrial estate, as well as the road itself and associated lighting.
1.4 Impact on Epping Forest Buffer	0	Site is unlikely to impact Epping Forest Buffer Land.	
1.5 Impact on BAP priority Species or Habitats	0	The site is not within a BAP priority area	The site is not within a BAP priority area as supported by desktop and site visit work undertaken by Liz Lake Associates see Peer Group Reg 19 objection appendix 6 Environmental Issues Ongar Park Estate paragraph 3.2.2

1.6 Impact on Local Wildlife Sites	0	Site has no effect as features and species could be retained or due to distance of local wildlife sites from site.	This site is more than the 250m buffer from Ongar Radio Station LWS. The site is unlikely to affect the features and species of this LWS.
1.7 Flood Risk	(++)	Site within Flood Zone 1.	
1.8a Impact on Heritage assets	(+)	Site is not likely to affect heritage assets due to their distance from the site.	The site is located over 250m from the Ongar radio Station so as not to impact on this heritage asset as recommended by the Master Plan
1.8b Impact on archaeology	(+)	There is a low likelihood that further archaeological assets would be discovered on the site	Land has been previously developed as golf course and as a radio station, this has included intrusive construction and the making up ground. As such there is little likelihood of archaeological remains
1.9 Impact of air quality	0	Site lies outside of areas identified as being at risk of poor air quality.	The site is a similar distance to site 0003 from the A414 and therefore is unlikely to be affected by poor air quality.
2.1 Level of harm to Green Belt	(-)	Site is within Green Belt, Where the level of harm caused by release of the land for development would be very low, or low or medium.	In terms of the Green belt assessment of this site in EB705B (sites 11.1 and 11.2) the site scores the same as the allocated sites and in the sensitivity test (removing Purpose 3) the site becomes the option with the least impact apart from R1-2.  It is also worth noting that the much larger Blakes Golf Course site (SR-0310 – 70.65 hectares) scored “very low, low or medium” in terms of harm to the Green Belt (see Arup Site Suitability Assessment). The site promoted by Peer Group (SR-0269N) is 15ha (21% of SR-0310) and is immediately adjacent to the settlement edge. The harm to the Green Belt by virtue of size and location of SR-0269N would therefore be less.

3.1 Distance to the nearest rail/tube station	(-)	Site is more than 4000m from the nearest rail or tube station.	
3.2 Distance to nearest bus stop	(+)	Site is less than 400m to a bus stop.	Site has routes through existing development to bus stops on High Road and Emberson way
3.3 Distance to employment locations	(+)	Site is within 1600m of an employment site/location.	
3.4 Distance to local amenities	(+)	Site is less than 1000m from nearest town, large village or small village.	The site is much closer to the settlement and the facilities along High Road than the proposed allocations
3.5 Distance to nearest infant/primary School	(+)	Site is less than 1000m from the nearest infant/primary school	Site has routes though existing development onto High Road and Emberson Way and then to St Andrews Primary School
3.6 Distance to nearest secondary school	(-)	Site is more than 4000m from the nearest secondary school	
3.7 Distance to nearest GP surgery	(+)	Site is within 1000m of the nearest GP surgery.	Site is within 1000m of the Limes medical centre GP surgery.
3.8 Access to Strategic Road Network		Not Applicable	
4.1 Brownfield and Greenfield Land	(++)	Majority of the site is previously developed land within or adjacent to a settlement	Land has been previously developed as golf course and as a radio station, this has included making up ground and is classified as non-agricultural land
4.2 Impact on agricultural land	0	Land has been previously developed as golf course and as a radio station, this has included making up ground and as such is classified as non-agricultural land	The site is not high quality agricultural land as supported by desktop and site visit work undertaken by Liz Lake Associates see Peer Group Reg 19 objection appendix 6 Environmental Issues Ongar Park Estate paragraph 4.2.2

4.3 Capacity to improve access to open space	(+)	Development could provide an opportunity to improve links to adjacent existing public open space or provide access to open space which is currently private	The development has the ability to improve access to open space as at present it is private land although there is a pressure for informal recreation and so there is the ability for development to provide formal access to open space beyond the development.
5.1 Landscape sensitivity	(-)	Site falls within an area of low landscape sensitivity - characteristics of the landscape are able to accommodate development without significant character change.	Liz Lake Associates Peer Group Reg 19 objection appendix 6 Environmental Issues Ongar Park Estate paragraph 5.3.23 assess this smaller site concluding that the scoring given by the SELSS report is incorrect and scores this much smaller site being as being 'low' on Overall Landscape Character Sensitivity. This is because the site is heavily influenced by the golf course management and use, as well as the adjacent residential properties overlooking the Site and creating a harsh, urban settlement edge. it concludes that the site is not consistent with the wider local landscape character area (F: Ridges and Valleys, F5: North Weald Bassett) as it is not in arable use, and there are minimal mature field trees and hedgerows in the landscape.



5.2 Settlement character sensitivity	(+)	Development may improve settlement character through redevelopment of a run down site or improvement in townscape	The Site lies adjacent to a largely unattractive and hard/ stark urban edge character that is not integrated or softened by planting, therefore not sensitive to change. The existing adjacent land use (golf course and grassland) has been assessed by Liz Lake Associates to be of no value or sensitivity that would constrain development and accordingly a well-designed housing scheme would be compatible with the adjacent land use, could be mitigated and this would provide an enhanced settlement edge character, which is softened and integrated into its context.
6.1 Topography Constraints	0	Topographical constraints exist in the site but potential for mitigation	The Site has a mean gradient of no more than 1:49 at its steepest point.
6.2a Distance to gas and oil pipelines	0	Gas or oil pipelines do not pose any constraint to the site	
6.2b Distance to power lines	0	Power lines do not pose any constraint to the site.	
6.3 Impact on Tree Preservation order (TPO)	0	The intensity of site development would not be constrained by the presence of protected trees either on or adjacent to the site.	
6.4 Access to site	(+)	Suitable access to site already exist	Existing access off High Road.
6.5 Contamination Constraints	(-)	Potential contamination on site, which could be mitigated	Potential contamination over site (Made Ground-Imported Waste). Potential adverse impact that could be mitigated
6.6 Traffic Impact	0	Area around the site expected to be uncongested at peak time, or site below the site size threshold where it would be expected to significantly affect congestion.	Access will be close to that for site SR-0003 which records that the area around the site expected to be uncongested at peak time.

**APPENDIX 3: SUMMARY OF INACCURACIES IN SITE SELECTION REPORT 2018 (EB805)**

**Table 1. Corrections to evidence base in Site Selection Report 2018 (EB805)**

Reason for rejection of Southern Expansion	Correction
<p>Expansion to the south of North Weald Bassett was considered as part of Scenario A. The NWB Masterplanning Study considered Scenario A to be a less suitable strategic option.</p>	<ul style="list-style-type: none"> <li>• The master plan (EB1003) does not use the term “Strategic Option”</li> <li>• Masterplanning Options for growth in chapter 6 (EB1003) does not state a preference for North or South</li> <li>• The final delivery options (1 - 3) on page 135 all include development to the south of NWB</li> </ul>
<p>The Southern Expansion strategic option is stated as being more sensitive to change in landscape terms than the strategic option to the north, as evidenced by the Settlement Edge Landscape Sensitivity Study (2010) (EB712) which concluded that the landscape to the south of North Weald Bassett is highly sensitive to change.</p>	<ul style="list-style-type: none"> <li>• Settlement Edge Landscape Sensitivity Study (2010) Fig 11.2 of EB712 suggests that the radio station site and the golf course to the south of NWB are part of a much wider Ancient Landscape.</li> <li>• Paragraph 1.5.1 (EB712) states that there are significant patches of sensitive historic landscape at the <b>north-eastern</b> and <b>western edges</b> of the village, which encompass patches of surviving pre 18th Century and 18<sup>th</sup> -19<sup>th</sup> century fields and a large area of Ancient Landscape to the south of the village. <b>Also to the west and east of North Weald Airfield sensitive areas of historic landscape comprise surviving pre 18th</b></li> </ul>

	<p><b>Century and 18<sup>th</sup> -19th century fields;</b></p> <ul style="list-style-type: none"> <li>The table below paragraph 11.5.2 (EB712) scores the whole of the area which extends all the way to the railway ( figure 11.4) as 4. This is a significantly larger site being assessed and the same assessment it is not true of the much smaller site being promoted for development as the old radio station and the golf course are not “typical of the wider landscape” in area 4.</li> </ul>
<p>It was considered through the NWB Masterplanning Study that,</p> <ol style="list-style-type: none"> <li>As a result of the rising topography of the area, development to the south-east of the settlement would have a greater impact on the landscape setting of North Weald Bassett than development to the north-west.</li> <li>This rising topography would also restrict the scope for access and connections from the existing settlement, in particular to the south-east of Emberson Way.</li> </ol>	<ol style="list-style-type: none"> <li>The master plan does not make this statement in terms of the rising topography</li> <li>The master plan does not make this statement in terms of the rising topography. Emberson Way is only mentioned in the following context:  <i>The southern edge has been defined by maintaining the distance of 250m, the length of Emberson Way from the High Road. Here the existing settlement is at its widest and the southern edge to development would seek to maintain but not increase this distance from the High Road.</i></li> </ol>

<p>c. Furthermore, aside from the railway line, no established natural or man-made features exist to the south of the strategic option; the level of development required to align with this potential edge would be disproportionately high compared with the scale of the existing settlement and would not integrate well with the settlement.</p> <p>d. It would also be challenging to mitigate visual harm to the surrounding landscape</p>	<p>c. The master plan does not make this statement in terms of the railway line nor does it consider this scale of development.</p> <p>d. The master plan does not assess the development of NWB all the way out to the railway line as suggested by this assessment.</p>
<p>This strategic option is also more sensitive to change in heritage terms relative to other strategic options around North Weald Bassett. The Historic Environment Characterisation Study (2015) concluded that the area to the south of North Weald Bassett, Gaynes Park, is of high sensitivity to change.</p>	<ul style="list-style-type: none"> <li>• Gaynes Park (area 10.2 in The Historic Environment Characterisation Study (2015) (EB900) page 143)) is to the south of the railway line and therefore is removed from the “reasonable alternative” being promoted in this objection. <b>Peel group site does not fall within this area.</b></li> <li>• Ongar Park (area 10.3 in The Historic Environment Characterisation Study (2015) (EB900)) which includes the Peer Group site is an extremely large area of land which extends further south of the railway line (figure 24 page 143) and the conclusions for this much <b>wider area cannot be</b></li> </ul>

	<p><b>applied to the much smaller reasonable alternative which is the Peer Group site.</b></p> <ul style="list-style-type: none"> <li>• It is noted that paragraph 5.3.6 clearly states that a lack of sensitivity to change should not be taken as an indication that no historic environment mitigation would be required to accommodate development and similarly a high sensitivity to change does not preclude development but does mean there will need to be early and detailed discussions on the impact and design of the development.</li> </ul>
<p>It is stated that the alleged impact on the historic environment is supported by the NWB Masterplanning Study, which highlighted the sensitivity of the Ongar Redoubt. This is a Scheduled Monument on the Heritage at Risk register and feedback from English Heritage through the Study indicated that residential development close to the Redoubt would not be supported.</p>	<ul style="list-style-type: none"> <li>• The actual statement from English Heritage is that development could cause a negative impact. <b>The Master Plan goes onto state (EB1003 page 153) investment in and refurbishment of the Ongar Redoubt Scheduled Monument could bring it back into public use and provide a new community facility and heritage asset for North Weald Bassett.</b> It states that the landowner is in conversation with English Heritage regarding potential for future uses of the Redoubt. This is a positive potential impact of development in this location.</li> <li>• <b>The North Weald Bassett Masterplan Study, produced for the Council in 2014 by Allies and Morrison, suggested a</b></li> </ul>

	<p><b>proposed buffer (page 118 of the A&amp;M Study) to protect the landscape setting of the Redoubt.</b> That buffer has been adopted by Peer Group in all of its proposals for the Peer Group site. None of the land being advanced by Peer Group extends into the buffer zone identified by Allies and Morrison.</p> <ul style="list-style-type: none"> <li>Heritage experts Peter Stewart Consultancy has undertaken a heritage assessment of the Peer Group site which provides an expert assessment on the effect of the proposed development on the setting of Redoubt SAM and concludes that the development of the Peer Group Site SR-269-N would not cause harm (SRRU reg19 Appendix 11).</li> </ul>
<p>Community engagement conducted as part of the NWB Master planning Study indicated that the majority of local residents and stakeholders do not favour development to the south of North Weald Bassett, emphasising the importance of the strategic option as a valued green space for informal recreation.</p>	<p>EB1003 page 143 states that some respondents identified a preferred option (indicating the level of development) within each scenario, with seven people voting explicitly for Scenario B, Option 1, making this the most popular approach. This is a development of just 500 dwellings to the north of NWB. <b>This limited response cannot be interpreted as support for the much larger proposal to the north.</b></p> <p>The vagueness of the questions (including how one might “feel” about development) and the fact that both Scenarios contained 3</p>



options lead to confusing and conflicting responses with some suggesting both scenarios would work while others commenting on the level of growth in one scenario (as a negative point) but failing to make the same point about the quantum of growth on the alternative scenario. **There is clearly support for development to the south as being a “Better distribution of housing” (answer to Q3 Scenario A)**

There is considerable concern with regard to reliance on such a small number of responses (35 forms and 9 written responses totalling 44) being used to determine the suitability or otherwise of allocations. The number of responses collected was far smaller than the number who are stated to have attended the exhibition (180) which might indicate the vast majority did not have convictions either way on terms of the level or direction of growth. **The Master Plan did not consider this exercise to be determinative as it proposed development to the south of the settlement.**

**There is no evidence of the reported results** for despite requests from Peer Group neither the council nor their consultants have been able to produce copies of the 35 responses with the Council

	<p>stating these have been lost or destroyed.</p>
<p>Green Belt</p>	<p>The Master Plan (EB1003) in determining the development options takes into account the assessment of the wider areas in the earlier Settlement Edge Landscape Sensitivity Study (2010) (EB712) and states (page 111) that the masterplanning study's approach to assessing Green Belt sites for potential development is consistent overall with this methodology.</p> <p>Using the scoring system in Green Belt Assessment phase 2 technical Annex (EB705B) suggests that the peel group Site preforms as well as or better than the proposed allocations. This evidence of the impact at the more local level supports the conclusions of the master plan and strongly supports the allocation of Peer Group site for development.</p>

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