

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

## **P4 Ongar Hearing Statement Appendix 2**

**Response from Jim Padfield.**

## Appendix 2 - A comparative analysis of the dwelling density in the allocations in Ongar.

At the public Enquiry David Coleman of EFDC and Derek Stebbing of Strutt and Parker responded to concerns expressed by Mary Dadd of the Ongar Neighbourhood Plan Group. The issues discussed are of such vital importance to the future character of Ongar that I hope consideration can be given to this additional response on this issue.

**First, A comparison with Sawbridgeworth.**

Ongar and Sawbridgeworth are small Towns 9 miles apart both with a long history, They are both set within the Metropolitan Green Belt. Ongar has 6,200 inhabitants lays within Epping Forest District Council (EFDC ) area. Sawbridgeworth 8,000 inhabitants is within East Herts District Council (EHDC ) . Both District Councils have produced new Local Plans in the last 12 months. East Herts has had their plan approved by the Inspector, EFDC's plan is currently being inspected.

Sawbridgeworth has three allocated sites with a total of 535 dwellings on land totalling 23.13 ha. So the density set is 23.13 dwellings per gross ha. ( not a typo but coincidence that area and DPH are the same)

Ongar has been allocated 590 dwellings of those 504 dwellings are allocated to three sites totalling 13.53 ha so 37.25 dwellings per ha.

**The planned allocated housing density in the sensitive Green Belt edge is 61% higher in Ongar than it is in Sawbridgeworth.**

Clearly the Ongar dwelling density is out of line with those of Sawbridgeworth as it is with most similar allocations in neighbouring Councils. ( see Appendix 1 attached )

**There must be a considerable doubt about the ability of the Ongar sites to deliver within Plan policies the housing numbers envisaged in the Plan.**

### **EFDC's Net Density Assumption.**

The EFDC baseline density is set at 30 dwellings per ha (dph). Ongar is regarded as a Town and so a density multiplier of 150 % is applied. Provision is provided for a number of constraints affecting density. For instance, various Environmental constraints, Tree Preservation Orders (TPO), Listed Buildings, Air Quality, Settlement Character, Gas pipelines, Local Setting are just some examples.

This Methodology has been applied in the following way:

ONG R5 Greensted Road was discounted by 20% because of *"Edge of settlement site likely to require a reduction in baseline capacity to reflect character of surrounding low density development"*. **Density set at 36dph**

ONG R4 is made up of 3 adjoining parcels, only one minor parcel was adjusted by 25% because of *"Settlement character impact likely to require a reduction to the baseline density of 45 dph which is relatively high for this edge of settlement location. Density adjusted accordingly."* As a result the whole allocation, 70% of which abuts new Green Belt Boundary is discounted by only 4.5% **Density set at 43dph**

West Ongar concept area ONG R1 R2 The allocation is accompanied by the following assessment : *"The site is located in an area of high landscape sensitivity. Development proposals should be carefully designed to minimise harm to the wider landscape taking into account the development's setting in the landscape and the local landscape character."* No density adjustment was made. **Density set at 45dph.**

#### In assessing ONG R4 EFDC Stated:

*“Settlement character impact likely to require a reduction to the baseline density of 45 dph which is relatively high for this edge of settlement location.*

If this statement is valid for part of ONG R4 then it is surely valid for the other sites, the discount allowed of 25% should have been applied to all these Green Belt Sites. Had they done so **the net density for these Ongar sites would have been set at 34 dph**. EFDC have set the Harlow Latton Priory Site at 25dph.

#### EFDC's Methodology for the Assessment the Net Developable Area of Each Site.

EFDC used their own version of an accepted methodology for estimating development potential It is based on the publication *“Tapping the Potential, best practice in assessing urban housing capacity”* (1999 report by URBED for the Department of the Environment Transport and the Regions). The report suggests a range of gross to net ratios which should be applied in order to determine the developable area of a site, and then a net density assumption can be applied.

Up to 0.4 hectare	100%
0.4 to 2 hectares	between 75% and 90 %
Over 2 hectares	Between 50% and 75%

Epping Forest Council decided without evidence or explanation to apply the following multipliers, but to further complicate direct comparisons the multiplier is in EFDC's case alone applied to house densities not to developable area. The end result is in fact the same.

Up to 1.0 hectare	100%
1.0 to 5 hectares	90 %
5 to 10 hectares	80%

Therefore on sites between 2 and 5 ha sites EFDC would apply a 90% multiplier whereas the highest recommended rate in the URBED recommendation is 75%.

URBED on page 21 cautions against the careless use of their multipliers:

*“Density multipliers are a rather blunt tool and fail to illustrate the implications of different densities for individual sites. **Even for professionals involved in the planning and design process it is hard to visualise what different densities can mean on a given site without embarking on design exercises** The alternative to density multipliers is the **design-led approach**. This has several advantages and is the most effective of all the yield assessment methodologies for most capacity sources. Typical sites are selected and subjected to design exercises.”*

## East Herts Methodology Stage 6: Estimating the Housing Potential of Each Site.

East Herts SLAA methodology para 3.25 states:

*“In the absence of locally defined density standards, Officer’s judgement will be used to determine the appropriate housing potential for each site, taking into account site size and the character of the local area. If appropriate, judgements will be informed by the density assumptions in the HCA and/or previous planning applications/permissions.”*

This is the better alternative **“design-led approach”** suggested by URBED. These East Herts sites have now moved onto full planning applications confirming the accuracy of the original Plan Allocations.

Taylor Wimpey have submitted their applications for **“Land north of West Road, Sawbridgeworth ( SAWB2 )”**

The total area is 5.38 ha the net developable area is 3.871ha which at 72% Gross to net is comfortably within Urbed’s of “Between 50% and 75%”. The Density within the developable area is 36 dph which correlates well with EFDC’s Methodology if it had been applied sensibly



In addition with ref to “Land north of West Road, Sawbridgeworth ( SAWB2 )” East Herts stated in their “Land uses and proposals” para 6.14.

*“Development in this location will provide approximately 1.2 hectares of land in order to help facilitate the permanent expansion of Mandeville Primary School to 2FE. The site will also include a parking area that will provide 29 spaces for the school. This will assist in reducing school related congestion on West Road at peak times.”*

By way of contrast EFDC have made no such provision on any site. There can be little doubt that serious traffic management issues will arise because of the close association of ONG R5 and the Chipping Ongar Primary school at a particularly dangerous section of the Greensted Road.

There can also be no doubt that the Ongar Health Centre also requires additional space yet ONG R3 on the Fyfield Road has been 100% allocated for housing which if implemented would forever prevent the expansion of the Health Centre and its urgently required parking. The Health Centre serves 12,000 patients which means more than half come from outside the Ongar Civic area.

Mid Suffolk have in approving a 120 home site in Woolpit have specified that 29 parking spaces are specifically provided for the Woolpit Health Centre which like Ongar serves a wide rural hinterland and has a similar sized patient list.

The planning application for **Land south of West Road Sawbridgeworth SAWB3** by David Wilson Homes is for 200 dwellings on 10.7 ha ( 1.5 ha of amenity space outside the allocation has been included to the west ).

The net developable area is 6.33 ha the gross to net ratio is 59% comfortably within Urbed’s parameters of “Between 50% and 75%”. The Density within the developable area is 31.5 dph.



## EFDC's Methodology for the Assessment of ONG R1

The only Ongar site with any detail available is the West Ongar Concept area ONG R1 & 2. The gross area of Ongar West is 5.9 ha the net area shown on the developers plan is 4.1 ha so a real world ratio of 70%. URBED correctly predicted "Between 50% and 75%.

However EFDC in the Allocation uses a 90% ratio which as we can see from the indicative plan provided by the developers cannot be achieved within Plan Policies and within the specific constraints noted in their allocation.



**As a result of this incorrect presumption in the Allocation the West Ongar density within the developable area has to rise to 57dph to achieve EFDC's planned 234 dwellings.**

At the public Enquiry Derek Stebbing of Strutt and Parker in response to concerns expressed by Mary Dadd of the Ongar Neighbourhood Plan Group confirmed that 57dph was no problem as far as the developer was concerned. This was a statement of the obvious given the financial incentive that this accords to the developer rather than a considered response to Mary Dadd's concern about the damage to the character of Ongar.

**"Qualitative assessment of any reduction in densities of the developable area that may be required to account for local setting and character."**

Stage 2 Assessment states: *"The site falls within an area of high landscape sensitivity - vulnerable to change and unable to absorb development without significant character change. **Low density development is proposed which reflects the character of the area**".*



Only one of the three larger Ongar sites has an overall Local Setting Density adjustment, that is Greensted Road ONG R5 with a 20% reduction. The reason stated surely applies to all Ongar sites including the West Ongar site. The assessment states *“Edge of settlement site likely to require a reduction in baseline capacity to reflect character of surrounding low density development.”*

**Listed Buildings – qualitative assessment of any likely reduction in density that may be required to mitigate impacts on a heritage asset.**

Stage 2 Assessment states: *“Proposed site located adjacent to a Listed Building or other heritage asset effects can be mitigated.”*

### **Tree Preservation Orders (TPOs)**

Stage 2 states *“The protected trees on or adjacent to the site could be incorporated into the development proposed, subject to care in the site. the layout, but would be likely to have a significant adverse impact on the suitability of the site for development.”*

### **Air Quality - for those sites scoring (-) or (--) at Stages 2 or 6.2**

Stage 2 Assessment states: *“Parts of the site are close to the A414 and therefore mitigation measures are likely to be required.”*

Using EFDC’s own methodology in its entirety the ONG R1 site capacity would therefore be as follows.

Gross Area 5.91 ha

Net Area 80% of Gross 4.73ha

Base Density 45 dwellings per ha (dph).

Less Local setting adjustment of 25% so 34dph.

EFDC applying their own methodology should have calculated the site capacity as 162 dwellings not 234.

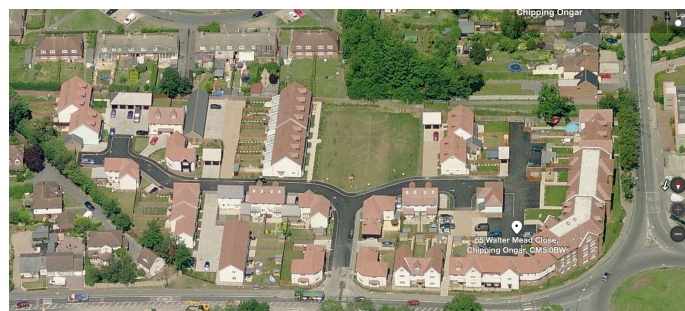
If EFDC used a **“design-led approach”** then with the actual planned area of 4.1 ha at 34dph the site capacity is 139 dwellings, 95 dwellings less than EFDC has planned.

Clearly the proposed EFDC density is incorrect. URBED’s caution on page 21 of *“Tapping the Potential, best practice in assessing urban housing capacity”* could not be more appropriate.

***“Even for professionals involved in the planning and design process it is hard to visualise what different densities can mean on a given site without embarking on design exercises”***

The residents of Ongar don’t have to look far to find an unfortunate example of high density housing. Across the A414 to the north **Walter Mead Close**, built by Higgins Homes on the old Council Highways yard, between 2003 and 2005. The site holds 80 homes with a high mixture of flats on 1.35 ha which is 59dph almost exactly the same as the West Ongar Site.

### **Walter Mead Close**





The West Ongar Concept site bears no comparison to the redundant Council Depot yard surrounded by housing and roads yet the same density is being suggest by EFDC in this Plan.

Currently in construction is the Rhone Poulenc in north Shelley on the Fyfield Road here 105 houses are being built by Bovis on 3.66ha giving a density of 28.7 dph.

**What possible justification can there be for ONG R1, ONG R2 and ONG R4 to be allocated housing at double the density of the Bovis site in Shelley see below.**





## Comparison with other Plan sites.

	Gross Development Area ha	Dwelling Yield	Dwellings per Ha
Land east of Nags Head Lane, Brentwood	5.88	125	21.26
Land Doddinghurst Road, side of A12, Brentwood	8.19	200	24.42
Site adjacent to Roman Road Ingatestone	8.14	161	19.78
<b>Brentwood Average</b>	<b>22.21</b>	<b>486.00</b>	<b>21.88</b>
Land north of West Road Sawbridgeworth (SAWB2 )	5.383	135	25.08
North Sawbridgeworth SAWB\$	7.55	200	26.49
Land south of West Road Sawbridgeworth (SAWB3 )	10.2	200	19.61
<b>Sawbridgeworth</b>	<b>23.13</b>	<b>535.00</b>	<b>23.13</b>
ONG R1 West Ongar Concept Framework Plan	5.91	234	39.59
ONG.R4 Land North of Chelmsford Road	4.3	163	37.91
ONG.R5 Land at Greensted Road	3.32	107	32.23
<b>Ongar Large site Allocations Average</b>	<b>13.53</b>	<b>504.00</b>	<b>37.25</b>
High Road Thornwood	4.01	124	30.92
South Nazeing Concept Plan Area	3.33	93	27.93
The Street Sheering	3.01	62	20.60
Oak Hill Stapleford Abbotts	2.13	33	15.49
Fingrith Hall Lane	1.95	30	15.38
Jessel Green	4.02	154	38.31
Fyfield Rd Ongar ex Rhone Poulec ste	3.66	105	28.69
Waltham Abbey Master Plan	32.33	612	18.93
<b>Average other EFDC Local Plan sites</b>	<b>54.44</b>	<b>1,213</b>	<b>22.28</b>
Land at Great Waking Rochford 16/00668/OUT	8.83	180	20.39
Land West of Great Waking Rochford 16/00731/OUT	5.3	120	22.64
Land at Bakers Lane, Black Notley Braintree 16/00605/FUL	3.96	96	24.24
Land West of Royston North Hertfordshire 16/00378/1	10.72	311	29.01
Land at Garden Walk, Royston North Hertfordshire 16/01477/1	0.92	19	20.65
Land North of Conrad Road, Witham Braintree 15/01273/OUT	6.4	150	23.44
<b>Average Other Local Plan sites</b>	<b>36.13</b>	<b>876.00</b>	<b>24.25</b>
Guildford LP POLICY A28: Land to the east of White Lane,	2.85	62	21.75
Guildford LP POLICY A38: Land to the west of West Horsley	8.4	135	16.07
Guildford POLICY A39: Land near Horsley railway station, East Horsley	5.7	100	17.54
Guildford POLICY A40: Land to the north of West Horsley	8	120	15.00
<b>Average Guildford Local Plan sites</b>	<b>24.95</b>	<b>417.00</b>	<b>16.71</b>