

EXAMINATION OF THE EPPING FOREST DISTRICT LOCAL PLAN – 2011 – 2033

EXAMINATION STATEMENT ON BEHALF OF CATEBSY ESTATES PLC

Matter 15 – Policy P6: North Weald Bassett (NWB)

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CONTENTS

<u>Section:</u>	<u>Page:</u>
1.0 Introduction	3
2.0 Matter 15 – Policy P6: North Weald Bassett (NWB)	3
<u>General Matters:</u>	
(i) Highways England has commented that the level of growth proposed here is likely to have an impact upon Junction 7 of the M11. Is this proposed to be mitigated by the provision of Junction 7a, or is something more required?	3
(ii) Is improved/increased public transport provision necessary to accommodate the scale of development proposed here and in Thornwood? Should Part F make reference to the need to deliver this type of infrastructure?	4
<u>Site Specific Matters:</u>	
(iii) Was the development of North Weald Golf Club on Rayley Lane considered as an alternative to sites allocated within the Masterplan Area? Why was it rejected? Why is site R3 , about which there are many objections in the representations, considered preferable?	5
(iv) Both Masterplan Areas: Should Part L(vi) require the conservation or enhancement of the relevant heritage assets in order to accurately reflect the requirements of legislation and national policy? Should a similar criterion be added to Part O to ensure that the historic environment and individual heritage assets are considered through the preparation of the North Weald Airfield Masterplan?	5
(v) NW Airfield Masterplan Area: Please could the Council clarify the nature of this area. What is the current nature/use of this extensive site? What is proposed to be retained and what/where is new development proposed? Is this clearly expressed on Map 5.12 which shows the majority of the masterplan area as “white land”? Part O(iii) requires provision to be made for c.10Ha of employment land whereas paragraph 5.96 refers to 40,000Ha. Which is correct?	5
(vi) NWB.R1 & NWB.T1: Is Map 5.12 accurate in showing the same site area for these allocations? Similarly, does the map of the NWB Masterplan Area in Appendix 6 require amendment because it presently does not show a Traveller site allocation at all? Is clarification required about where the Traveller site is expected to be provided? If it is expected to be provided as part of NWB.R1, is this justified?	5
(vii) What effect would the development of the following sites have on the purposes of the Green Belt: NWB.E3 & E4; and NWB.R1-R5 & T1? Would a defensible boundary be achieved for NWB.R1?	6
3.0 Changes Sought	8

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1.0 Introduction

- 1.1 This Examination Statement provides a response on behalf of Catesby Estates Plc ("Catesby"), to those Questions raised by the Inspector (dated November 2018), relating to Policy P6: North Weald Bassett (NWB) in respect of the Epping Forest District Local Plan 2011 – 2033 ("the Plan") and its supporting evidence base.
- 1.2 This Statement has been prepared by Neame Sutton on behalf of Catesby Estates Plc.

2.0 Matter 15 – Policy P6: North Weald Bassett (NWB)

General Matters:

- (i) *Highways England has commented that the level of growth proposed here is likely to have an impact upon Junction 7 of the M11. Is this proposed to be mitigated by the provision of Junction 7a, or is something more required?*
- 2.1 It would appear from a review of the Highways England consultation response to the Regulation 19 consultation stage that impact on Junction 7 is of concern. However, the funding secured through RIS-1 in January 2014 will help fund the new Junction 7a on the M11¹, which has been as a direct result of the lobbying undertaken by Epping Forest District Council and Essex County Council. This project is therefore likely to proceed.
- 2.2 The issue of concern is not therefore in relation to the impact on Junction 7 but more in relation to any intervening highway measures that may still be required either with Junction 7a in place or in advance of the Junction 7a scheme being completed.

¹ Page 1 of Highways England Regulation 19 consultation response from January 2018

- 2.3 The Transport Assessment report prepared by Essex County Highways (EB503) appears to confirm in its concluding section (Page 101 onwards) that scenarios have been tested that include the provision of mitigating infrastructure to ensure that the impact on the network is not severe. It is not clear, in the case of NWB, what the exact package of measures required is.
- 2.4 The Council's IDP (EB1101C) published in October 2018 and the more recent Addendum and Appendices (EB1101 E, Ei and Eii) does appear to identify specific highway infrastructure projects that are necessary for the development proposed at NWB to come forward. These schemes are then apportioned to the respective allocations with contribution levels identified (EB1101 Ei specifically refers).
- 2.5 On that basis it would appear that there are measures beyond Junction 7a required to ensure the NWB allocations are adequately mitigated and these have been quantified in the IDP.
- (ii) *Is improved/increased public transport provision necessary to accommodate the scale of development proposed here and in Thornwood? Should Part F make reference to the need to deliver this type of infrastructure?*
- 2.6 The Transport Assessment EB503² confirms that encouraging modal shift is of importance alongside the physical transport mitigation measures proposed in the Plan. In the case of NWB it is important for the Plan to take advantage of those locations best served by existing public transport and in closest proximity to existing services, facilities and employment opportunities.
- 2.7 In Catesby's view Part F of the policy should make reference to this to ensure that the allocations seek to maximise the potential for increased modal shift and taking opportunities to enhance public transport opportunities.

² Page 104 of EB503 refers

Site Specific Matters:

- (iii) *Was the development of North Weald Golf Club on Rayley Lane considered as an alternative to sites allocated within the Masterplan Area? Why was it rejected? Why is site **R3**, about which there are many objections in the representations, considered preferable?*

2.8 We will leave the Council to deal with these specific queries.

- (iv) **Both Masterplan Areas:** *Should Part L(vi) require the conservation or enhancement of the relevant heritage assets in order to accurately reflect the requirements of legislation and national policy? Should a similar criterion be added to Part O to ensure that the historic environment and individual heritage assets are considered through the preparation of the North Weald Airfield Masterplan?*

2.9 Catesby considers that Parts L and O should be updated to reflect the requirements of legislation and the Framework 2012 specifically Paragraph 126.

- (v) **NW Airfield Masterplan Area:** *Please could the Council clarify the nature of this area. What is the current nature/use of this extensive site? What is proposed to be retained and what/where is new development proposed? Is this clearly expressed on Map 5.12 which shows the majority of the masterplan area as “white land”? Part O(iii) requires provision to be made for c.10Ha of employment land whereas paragraph 5.96 refers to 40,000Ha. Which is correct?*

2.10 We will leave the Council to deal with these specific queries.

- (vi) **NWB.R1 & NWB.T1:** *Is Map 5.12 accurate in showing the same site area for these allocations? Similarly, does the map of the NWB Masterplan Area in Appendix 6 require amendment because it presently does not show a Traveller site allocation at all? Is clarification required about where the Traveller site is expected to be provided? If it is expected to be provided as part of NWB.R1, is this justified?*

2.11 We will leave the Council to deal with these specific queries.

(vii) *What effect would the development of the following sites have on the purposes of the Green Belt: **NWB.E3 & E4**; and **NWB.R1-R5 & T1**? Would a defensible boundary be achieved for **NWB.R1**?*

2.12 In short terms Catesby has concerns regarding the delineation of the proposed allocation sites at NWB and the consequential effect on the purposes of the Green Belt. In particular Catesby's concern relates to the following:

- The need for boundaries to endure for the long term³;
- Being able to demonstrate that Green Belt boundaries will not need to be altered at the end of the Plan period⁴; and,
- Defining boundaries clearly, using physical features that are readily recognisable and likely to be permanent⁵.

2.13 As we have already covered in Matters 1, 3, 4 and, 5 (either on behalf of the Epping Forest Housing Forum or Catesby) the Council has not demonstrated that the Green belt boundaries will not need to be altered at the end of the Plan period. In fact it is probable that the boundaries will need to be altered well before the end of the Plan period and certainly as part of the 5 year review requirement set out in Paragraph 33 of the Framework 2019, which will take effect immediately following the adoption of the Plan.

2.14 In the context of NWB the boundaries defined on Map 5.12 do not, insofar as NWB.E4, NWB.R1 and NWB.R3 follow clearly defined physical features that are readily recognisable, likely to be permanent and, consequently result in boundaries that will endure for the long term.

2.15 The NWB Masterplanning Study considered this matter in detail and identified both existing physical boundaries and potential defensible boundaries⁶. These conclusions are supported by the more recent Green Belt Study (Stages 1 and 2)⁷ particularly in relation to Parcels 010.1 and 010.2. Unfortunately the existing physical boundaries and potential defensible boundaries identified and supported by the evidence base are not reflected in the delineation of the proposed allocations on Map 5.12. This is particularly the case in relation to NWB.R1 (northern boundary), NWB.R3 (eastern boundary) and, NWB.E4 (western boundary). The matter of the latter two boundaries

³ Paragraph 83 of Framework 2012

⁴ Paragraph 85 bullet point 5 of Framework 2012

⁵ Paragraph 85 bullet point 6 of Framework 2012

⁶ See Map on Page 118 of NWB Masterplanning Study – September 2014 – EB1003A and EB1003B

⁷ EB704A, EB704B, EB705A and, EB705B

was discussed in detail in the context of both Matters 4 and 5⁸ and is not therefore repeated here.

- 2.16 The Council has not therefore reflected its established evidence base in relation to the matter of Green Belt boundaries for NWB. The consequence is that Map 5.12 does not establish defensible long term Green Belt boundaries in accordance with the Framework 2012 and they are unlikely to endure beyond the first 5 years of the period following adoption of the Plan given the need for a review of the Plan⁹ and the consequent and inevitable uplift in housing requirement that will need to be accommodated.
- 2.17 This matter could be rectified via relatively simple boundary changes reflective of the NWB Masterplanning Study and the subsequent findings of the Green Belt Study to provide more defensible boundaries and also scope for land to be safeguarded ready for the review of the Plan.
- 2.18 These comments are all made in isolation of Catesby's particular land promotion interest¹⁰ and are instead reflective of the importance of meeting all of the purposes of the Green Belt as required by Paragraph 80 of the Framework 2012.

⁸ Note this was raised at the Matter 5 session by Neame Sutton as well as Peter Brett Associates on behalf of Mr J Foulds and Mrs R Gemmill (19LAD0122)

⁹ Paragraph 33 of the Framework 2019

¹⁰ Land at Church Lane, North Weald Bassett – Site Ref: SR-0003

3.0 Changes Sought

3.1 Catesby considers the following changes should be made to the Plan for it to be found Sound:

1. The Council needs to clarify its position regarding highway infrastructure improvements/mitigation requirements for NWB;
 2. Part F of Policy P6 should be amended to ensure that the allocations maximise the potential for increased modal shift taking opportunities to enhance public transport opportunities;
 3. Parts L and O of Policy P6 should be amended to reflect the requirements of legislation and the Framework 2012 specifically Paragraph 126; and,
 4. The Green Belt boundaries for NWB should be amended to reflect the evidence contained in the NWB Masterplanning Study – September 2014 and the subsequent Green Belt Study.
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