

For and on behalf of
Peer Group Plc

**Epping Forrest Local Plan Examination
Response To MIQ's: Matter 15
Policy P6: North Weald Bassett (NWB)**

**Ongar Park Estate
North Weald Bassett**

**Prepared by
Strategic Planning Research Unit
DLP Planning Ltd
Sheffield**

April 2019

Prepared by:	Aled Barcroft/Roland Bolton
Approved by:	Roland Bolton
Date:	April 2019

Strategic Planning Research Unit

**V1 Velocity Building
 Ground Floor
 Tenter Street
 Sheffield
 S1 4BY**

Tel: 01142 289190

**Broad Quay House (5th Floor)
 Prince Street
 Bristol
 BS1 4DJ**

Tel: 01179 058850

**4 Abbey Court
 Fraser Road
 Priory Business Park
 Bedford
 MK44 3WH**

Tel: 01234 832740

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1.0 POLICY P6: NORTH WEALD BASSETT (NWB)

General Matters

1. **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?**

Access and Highway Considerations

- 1.1 Highways England has commented that the District and County Councils have successfully persuaded the DfT to switch funding from the scheme of improvements to improve J7 of the M11, as set out in the Roads Investment Strategy, to help fund the creation of a new junction J7a.
- 1.2 Highways England has confirmed they and the County Council are working on the delivery of the new Junction 7a on the M11. The new junction is to be located to the east of Harlow and to the north of the existing Junction 7.
- 1.3 The new Junction will provide a new access between Harlow and the M11. This will help to alleviate traffic pressures at Junction 7 and along the A414, improving network capacity in the area around North Weald Bassett and Thornwood.
- 1.4 There are several direct access points to and from the Ongar Park Estate site to the High Road and the A414. There are no major constraints in this respect. Furthermore, an existing access from the A414 could provide access to the site directly from the A414 such that no construction traffic would need to pass through the village of North Weald Bassett during the construction phase.
2. **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? (NWB PC).**
- 1.5 Access by Sustainable Travel Modes:
- 1.6 The Ongar Park Estate site has excellent access to existing public transport. A regular bus service operates in the village approximately once every half hour from 6.00 am until 8pm. The service has direct links to surrounding towns, including Epping and Harlow. Epping Underground Station is on the Central Line tube service with a direct link to Central London. There is also a direct rail service from Harlow to London Liverpool Street Station.
- 1.7 The site is accessible by sustainable travel. There are a range of bus services that are served from many bus stops that are a short walk from the site, providing direct links to the town centre and the Railway Station. The site is also well connected to a network of footways and signed cycle routes in residential areas that are relatively lightly trafficked.
- 1.8 The site is located within a reasonable walking distance to all local services, amenities and facilities, including close proximity to the primary school and local shops. The site can be designed with legible and safe access and egress for pedestrians, cyclists as well as vehicles, to ensure it would have a positive effect upon promoting sustainable travel options, and ensuring that they are available to residents throughout the site.
- 1.9 It is therefore not anticipated that there would be any required improvements to public

transport provision to support development at the site.

Site Specific Matters

3. 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?

- 1.10 It is unclear why this site is being considered as a reasonable alternative when sites which were part of the Allies and Morrison Master Plan have not been assessed as reasonable alternatives. The Council advances the Allies and Morrison Master Plan and its sequential approach (Policy SP 2) in the submission Plan but it has not applied these tests objectively and consistently (or in the case of the Peer Group site at all) to site allocations in North Weald Bassett. This raises serious points regarding the site selection process and its compliance with the NPPF and the Calverton judgment. The detail of these concerns is set out in Appendix 1 of this response which contains a letter on behalf of the objectors Peer Group by their solicitors Hogan Lovells highlighting what they consider is a failing of the Local Plan process in terms of the requirement to consider reasonable alternatives.
- 1.11 The North Weald Golf Club (SR-0179) was not identified or assessed in the Allies and Morrison Master Plan Study 2014 or considered as a "reasonable alternative" to development to R3 (SR-0153 A & B) or any other site in North Weald Bassett.
- 1.12 The Peer Group site (SR-0269A-N) was identified as a preferred location of growth in the Allies and Morrison Master Plan (EB1003) and was clearly a "reasonable alternative" to R3 (SR-0153 A & B). In options 1 (EB1003b Page 120) development is proposed on part of SR-0269-N in advance of any development on R3 (SR-0153 A & B).
- 1.13 In the Master Plan Study, (EB1003b Pages 121) Option 2 the development of the whole of the Peer Group site (SR-0296-N) is proposed in advance of the complete development of R3 (SR-0153 A & B).
- 1.14 It is only in Option 3 (EB1003b Page 125) that the whole of R3 (SR-0153 A & B) is proposed for development in the Master Plan, but even then as a "third tier" site allocation. The Master Plan clearly places the allocation of R3 (SR-0153 A & B) sequentially after the complete development of the Peer Group site SR-02296-N. Any reasonable, objective and consistent application of the Council's own sequential site selection process would also place the Peer Group site at significant preference to R3 (SR-0153 A & B) and to a substantial number of other sites which have been allocated in North Weald Bassett. We say this based on the Council's own methodology for site allocations in North Weald Bassett.
- 1.15 Whilst North Weald Golf Course is not assessed by the Allies and Morrison Master Plan Study 2014, it is assessed in the Arup Site Suitability Assessment at SR-0179 as 30.87 hectares for 926 dwellings. The land owned by Peer Group which is assessed by Arup (but which has not been advanced for development as SR-0310 – 70.65 hectares for 2,077 dwellings) is also assessed by Arup and scores better than North Weald Golf Course. However, the site actually being promoted by Peer Group is just 15 hectares for 285 new dwellings, which would score significantly better than North Weald Golf Course and most of the sites which the Council proposes for allocation in its submission Plan.
- 1.16 In terms of objections to the Master Plan Exhibition in June 2014, Allies and Morrison

record that none of the 35 public responses who stated a preference supported an option that included the complete development of R3. This was option 3 in both scenario A or B (Question 4 EB1003B page 142). The Council has subsequently informed Peer Group that these public responses have been lost or destroyed.

- 1.17 While the Allies and Morrison Master Plan initially identifies the North Weald Golf Club (SR-0179) at EB1003B page 100, it was excluded from further consideration because the site was identified as being less suitable for development for the following reason:

SR- 0179 and SR0467

These sites are not considered to be appropriate for new development as they are located a considerable distance from existing development, so will not integrate effectively with North Weald Bassett's existing settlement form. The sites also sit to the north-west of the settlement, towards Harlow and therefore may prompt concerns regarding coalescence with the town.

- 1.18 While not identified as a preferred location for growth the North Weald Golf Club (SR-0179) was subject to the 32 point assessment in EB805Fiii. The Peer Group land SR-0310 for 2077 new homes (which has never been promoted for development by Peer Group) was also subject to the 32 point assessment. The summary table below compares the scores between the allocation R3, the Peer Group site which was included in the original Master Plan (as SR-0296-N) and North Weald Golf Course (SR-0179). As this assessment was not undertaken for SR-0296-N (being the site actually promoted by Peer Group) the table below uses the assessment for the larger area (SR-0310) but with the changes outlined under Matter 5 as a result of correction of errors or a different assessment due to size of site.
- 1.19 This assessment does suggest that the Peer Group site SR-0296-N is the most suitable site for allocation. Such a conclusion would be supported by the final chapters of the Master Plan (EB1003B). The Peer Group site scores well in terms of the previously developed element of the site and the fact that it is not classified as agricultural land (it is in fact a golf course with imported fill) and certainly not high quality agricultural land.

Table 1. Comparison of results of Site Suitability Assessment for Allocation R3 to Peer Group site SR-0296 and North Weald Bassett Golf Course SR-0178

Criteria	Peer Group Site SR0296N	Allocation R3 (SR0158 A)	Allocation R3 (SR0158 B)	North Weald Bassett Golf Course SR-0178
1.1 Impact on internationally protected sites	0	0	0	0
1.2 Impact on nationally protected sites	0	(-)	0	(-)
1.3a Impact on ancient woodland	0	0	0	0
1.3b Impact on Ancient / Veteran Trees outside of Ancient Woodland	0	(-)	0	0
1.4 Impact on Epping Forest Buffer	0	0	0	0
1.5 Impact on BAP priority Species or Habitats	(-)	0	(-)	0
1.6 Impact on Local Wildlife Sites	0	0	0	0
1.7 Flood Risk	(++)	(++)	(+)	(-)
1.8a Impact on Heritage assets	0	(+)	0	0
1.8b Impact on archaeology	0	0	0	0
1.9 Impact of air quality	(-)	(-)	0	(-)
2.1 Level of harm to Green Belt	(-)	(-)	(-)	(-)
3.1 Distance to the nearest rail/tube station	(-)	(-)	(-)	(-)
3.2 Distance to nearest bus stop	0	0	(-)	(-)
3.3 Distance to employment locations	(+)	(+)	(+)	0
3.4 Distance to local amenities	0	0	0	0
3.5 Distance to nearest infant/primary School	0	0	0	0
3.6 Distance to nearest secondary school	(-)	(-)	(-)	(-)
3.7 Distance to nearest GP surgery	0	0	0	0
3.8 Access to Strategic Road Network				
4.1 Brownfield and Greenfield Land	0	(- -)	(- -)	(- -)
4.2 Impact on agricultural land	(++)	(+)	(- -)	(- -)
4.3 Capacity to improve access to open space	(+)	(+)	(+)	0
5.1 Landscape sensitivity	(-)	(-)	(-)	(-)
5.2 Settlement character sensitivity	0	0	(-)	(-)
6.1 Topography Constraints	(-)	(-)	0	(-)
6.2a Distance to gas and oil pipelines	0	(-)	0	0
6.2b Distance to power lines	0	0	0	0
6.3 Impact on Tree Preservation order (TPO)	0	0	0	0
6.4 Access to site	(+)	(+)	(+)	(+)
6.5 Contamination Constraints	(-)	(- -)	(-)	(-)
6.6 Traffic Impact	0	0	0	0

- 1.20 To briefly summarise the above table the actual site being promoted by Peer Group scores two double positive impacts and is the only site not to score a double negative impact and have just 8 negative impacts (and no double negatives) while the allocated housing site Allocation R3 (SR0158 A) has just one double positive impact and 11 negatives including two double negative impacts. In the context of this assessment the smaller site identified by the Master Plan and promoted by Peer Group scores better than the allocated site.

4. 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? (Reps HE).

- 1.21 It is considered that the final approach to the development at NWB has underplayed the impact on the listed and historic buildings and that there should be more of a standoff in respect of the listed St Andrews Church and its setting to the new development being proposed. The church lies to the north of the allocations but provides a focus point in terms of the present views from the open countryside to the south which is proposed to be developed.
- 1.22 Provision should be made within part O for a greater distance between the new development and the church as this is a visually important feature in the landscape.
- 1.23 It should be noted that the Allies and Morrison Master Plan fully considered the proximity of the Redoubt to the Peer Group site and Allies and Morrison proposed a buffer zone in their Master Plan. That buffer zone has been fully respected by Peer Group and adopted into the site being advanced by Peer Group. In addition, Peer Group has submitted its own expert heritage assessment.

5. 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?

- 1.24 It is noted that the policy requires conformity with the Master Plan for the airfield, and it is noted that the submission Plan itself does not follow the earlier Master Plan for development at NWB.
- 1.25 The submission Plan makes no reference to the airfield in its Transport objectives (paragraphs 3.78 to 3.96 and Policy T1 and T2).
- 1.26 P6 North Weald Bassett N and O (i) – (iv) confirm the retention and expansion of aviation uses at the airfield. Such uses require compliance with Public Safety Zones and consideration of wider risk, nuisance and, in particular, noise.
- 1.27 It is also understood that the Police intend to relocate its helicopter operation to the airfield at North Weald Bassett, which is likely to create in excess of 20,000 new helicopter movements per annum, day and night, 24/7.
- 1.28 The submission Plan also recognises and promotes the expansion of aviation use and

growth at the airfield, which is not taken into consideration by the Council in its weighing of residential sites in close proximity to the airport. The Peer Group site, whilst being fully integrated into the settlement pattern, is also the site which is furthest from the airport.

- 6. 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 specifically, is this justified?**

1.29 No comment

- 7. 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?**

1.30 According to the Epping Forrest District Green Belt Assessment Stage 2 (EB705B) the release will have the following impacts identified in the table on the next page. Again, this illustrates that on the Council's own evidence base that the Peer Group SR-0269-N performs better than the proposed site allocations.

1.31 Applying the Council's own scoring system in EB705B the northern part of the Peer Group site is assessed as having the same impact as the main part of the allocation NWB R3 and the southern part of the Peer Group site causes is the second least harm to the Green Belt within that settlement.

Table 2. Comparison of assessed green belt function from EB705B

	Site Reference in Green Belt Appraisal	to check the unrestricted sprawl of large built-up areas	to prevent neighbouring towns merging into one another	to assist in safeguarding the countryside from encroachment	to preserve the setting and special character of historic towns;	to assist in urban regeneration	
NWB.E3	10.4	No contribution	Moderate	Relatively Strong	No contribution	Not Assessed	
NWB E4;	10.3	No contribution	Moderate	Relatively Strong	No contribution	Not Assessed	
NWB.R3-R5	10.2	No contribution	Moderate	Moderate	No contribution	Not Assessed	
NWB.R1-R2 & T1	10.1	No contribution	No contribution	Relatively Weak	No contribution	Not Assessed	
Peer Group site SR0269-N							
	11.1	No contribution	Weak	Moderate	No contribution	Not Assessed	
	11.2	No contribution	Relatively Weak	Relatively Strong	No contribution	Not Assessed	
North Basset Golf Course SR-0178	8.2	No contribution	Moderate	Strong	No contribution	Not Assessed	
Score							Total
NWB.E3	10.4	0	3	4	0	0	7
NWB E4;	10.3	0	3	4	0	0	7
NWB.R3-R5	10.2	0	3	3	0	0	6
NWB.R1-R2 & T1	10.1	0	0	2	0	0	2
Peer Group site SR0269-N (Master plan site 1C)							
	11.1	0	1	3	0	0	4
Peer Group site SR0269-N (Master plan site 2D)							
	11.2	0	2	4	0	0	6
North Weald Golf Course	8.2	0	3	5	0	0	8

- 1.32 It is recognised that these assessments can have a degree of subjectivity to them, hence it is useful to compare sites within the same assessment. On this basis it remains unclear why the final SA & Site Selection Assessments excluded the Peer Group site SR-269-N but includes the poorer performing North Weald Golf Course (SR-0178).
- 1.33 It should be noted that the Epping Forest District Green Belt Assessment: Stage 2 (EB705B) undertakes sensitivity testing of the findings (paragraph 4.10 and Figure 4.6). This approach considers the potential level of harm to the Green Belt associated with release of each parcel, taking account of Green Belt purposes 1, 2, and 4 (i.e. excluding purpose 3, namely 'to assist in safeguarding the countryside from encroachment').
- 1.34 The Assessment goes on to state (paragraph 4.17) that this analysis provides a more nuanced picture of how Green Belt performs across the District and may provide the Council with a better tool and evidence base upon which to make decisions about the performance of Green Belt across the District and those locations where Green Belt release may be more appropriate.
- 1.35 As the table below shows the impact of releasing NWB.R1-R2 & T1 from the Green Belt is very low but the next area with the lowest harm would be the Peer Group site SR0269-N. This further supported because the Council's proposed allocations score less favourably than the Peer Group site notably on purpose 2 of the green belt to prevent neighbouring towns merging into one another.

Table 3. Comparison of assessed green belt function from EB705B

	Site Reference in Green Belt Appraisal	To check the unrestricted sprawl of large built-up areas	To prevent neighbouring towns merging into one another	To preserve the setting and special character of historic towns;	To assist in urban regeneration	Score without purpose 3
NWB.E3	10.4	0	3	0	0	3
NWB E4;	10.3	0	3	0	0	3
NWB.R3-R5	10.2	0	3	0	0	3
NWB.R1-R2 & T1	10.1	0	0	0	0	0
Peer Group site SR0269-N (Master plan site 1C)	11.1	0	1	0	0	1
Peer Group site SR0269-N (Master plan site 2D)	11.2	0	2	0	0	2
North Weald Golf Course	8.2	0	3	0	0	3

- 1.36 It should be noted that an independent assessment of the two parcels that make up SR-0289-N was undertaken by Liz Lake Associates (Peer Group Reg 19 submission appendix 5 pages 26 to 30) and this scored the impact and harm on the Green Belt even lower than in the table above.
- 1.37 It is reasonable for the objectors (in this case the Peer Group) and other interested parties to expect the Secretary of State (through PINS) to require Council's to be

consistent in the application of their site selection criteria such that interested parties can have confidence in the site allocation process. In terms of the Green Belt the Calverton Judgement is clear regarding the process that should be followed. This is set out in paragraph 51 of the judgement which states after the planning judgments involved in the ascertainment of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) should, at least ideally, identify and then grapple with the following matters:

- a. the acuteness/intensity of the objectively assessed need (matters of degree may be important);
- b. the inherent constraints on supply/availability of land *prima facie* suitable for sustainable development;
- c. (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;
- d. the nature and extent of the harm to *this* Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and
- e. the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.

- 1.38 The reference to “*this*” Green Belt (in (d) above) requires the Council to consider all allocated sites against their reasonable alternatives at a sufficient level of granularity in order to compare the nature and extent of harm. Against the Council’s own assessment of impact and harm the consequential impacts of Green Belt release could be reduced further by the release of the Peer Group site south of North Weald Bassett when compared to higher scoring allocations and as such should be the preferred approach in accordance to part (d) and (e) above.
- 1.39 This imposes an obligation on the Inspector to properly consider those omission sites which have been identified by the Allies and Morrison Master Plan, and which score (or would have scored well under the Council’s own sequential test) that are plainly reasonable alternatives in the SA.
- 1.40 It is further noted that in the C K Properties Judgment (EB127) the judge noted that the omission site in which the Claimant had an interest had been rejected for reasons set out albeit briefly in the report. It has been established however that this is not the case for our client’s site which was not subject to any such appraisal (EVB127 paragraph 80).
- 1.41 The submitted Plan and its supporting documentation remains unsound because the procedure for site selection is not clearly evidenced, the council have not followed the Allies and Morrison Master Plan or the sequential test as set out in the submitted plan and the proposed deletion of this sequential test approach from the Plan does not overcome the issue that it has not been followed and that there remain at the heart of the Plan a lack of clear evidence justifying the final site selections. These shortcomings render the allocations in the submitted Plan as being incapable of objective comparison across the District or against reasonable alternatives.
- 1.42 The discounting of reasonable alternatives on the basis of an assessment of much larger but poorly defined “strategic” areas of land, which do not share the same characteristics, is contrary to the SA regulations and not consistent with the NPPF 2012 (paragraph 182).
- 1.43 Finally, the council’s approach to site selection is at considerable variance with that being undertaken at Welwyn and Hatfield were that Council (at the request of the

inspector) has undertaken a further detailed assessment of all potential Green Belt sites (including omission sites). This is being undertaken at the site-by-site level (in accordance with the approach in Calverton) and is not limited to predetermined areas of search by excluding “less strategically preferred” locations.

APPENDIX 1: LETTER FROM HOGAN LOVELLS

14 March 2019

By email

Our ref C2/GALLIMOM/9190790
Matter ref 1P2714/000017

Ms Louise Phillips MA MSc MRTPI
c/o Louise St John Howe
Programme Officer
P O Services
P O Box 10965
Sudbury
Suffolk, CO10 3BF

Dear Ms Phillips

PEER GROUP PLC- LAND AT NORTH WEALD BASSETT

We are instructed by Peer Group plc in respect of its land in North Weald Bassett (NWB) which it has advanced for allocation through the EFDC Local Plan process.

This letter concerns Matter 5 (Site Selection Methodology) and Matter 15 (Policy P6), North Weald Bassett.

With regard to Matter 5 Issue 1 (b), you have asked "*How was the Site Selection Methodology (SSM) utilised in the Site Selection Report 2018 (EB805) established and is it robust?*" Our client's land has not been assessed in the Site Selection Report 2018 and, for the reasons expanded below, the Site Selection Methodology is fundamentally flawed.

As a starting point, we have attached a copy of the 15 hectare (38 acre) site which has been consistently and clearly advanced by Peer Group to the Council in the period from June 2014 forward. That site is immediately adjacent to the settlement edge and would accommodate approximately 285 new homes.

The Peer Group site was identified in the Allies and Morrison Master Plan Study (the A&M Study) as sites 1C and 2D (EB1003B – pages 120 – 121 and 135). We attach an extract of the A&M Study, which confirms that Allies and Morrison considered

- (i) those sites in NWB that would best deliver up to 458 new homes - coloured red
- (ii) which additional sites would best deliver up to 1,021 new homes - coloured orange and
- (iii) which further, but less suitable sites, would be required to deliver up to 1,540 new homes - coloured yellow.

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The Peer Group site 1C was coloured red (most favourable for up to 458 new homes) and site 2D was coloured orange (favourable for up to 1,021 new homes).

Notwithstanding the A&M Study, the Council has failed to assess the Peer Group site in its 2016 (EB801) or its 2018 (EB805) Site Suitability Assessments undertaken by Arup. Indeed, as explained below, the Council has assessed the wrong site.

We attach an extract from the Council's Site Suitability Assessment 2016, prepared by Arup (EB801Gxi), which provides a site assessment in two parts (1) SR-0269A (119.39 hectares - 300 acres) for 3,950 new dwellings and (2) SR-0310 (70.65 hectares – 175 acres) for 2,077 new dwellings. This is a total of 190 hectares for 6,027 new dwellings. These vast sites to the southeast of NWB have never been advanced by our client or any other party, either separately or together, for development. The 2016 assessment by Arup, on behalf of EFDC, is therefore flawed and misleading.

The Site Suitability Assessment (Appendix B) dated March 2018 (EB805Fiii), again prepared by Arup, was not available at any time during Regulation 19 consultation. When that assessment was finally made public, our client's land was identified as SR-0310 (Blakes Golf Course) as 70.65 Hectares for 2,077 new homes. Our client has never advanced the whole of SR-3010 for development. The 2018 assessment by Arup, on behalf of EFDC, is therefore flawed and misleading.

In the period between 2014 and the submission of the Local Plan, including substantial and detailed Regulation 18 and Regulation 19 representations, our client and its advisors have repeatedly written to the Council pointing out the errors in its identification and assessment of the Peer Group land, whilst seeking assurances from the Council that it would identify, assess and properly consider the correct site, as advanced by our client. Regrettably, the Council has not done so.

It appears that the Council has rejected our client's site on the basis that it is located within a vast (but undefined) area to the south of NWB which it considers to be a "*less suitable strategic option*". However, the Council has failed to identify the scale or boundaries of the "*strategic option*" to which it refers and has presented no evidence to support that strategy, or the reasonable alternatives to that strategy. Furthermore, at a more detailed level, the Council has failed to assess or consider our client's site as a "reasonable alternative" to the sites which it has allocated in NWB. Given the fact that the A&M Study found our client's sites to be amongst the most suitable and sustainable in NWB, the Council's position is unjustified and indefensible.

The Council has also failed to consider or apply the High Court judgment of Mr Justice Jay, in the case of *Calverton Parish Council v Nottingham City Council* [2015] EWHC 1078 (Admin) concerning the test of exceptional circumstances for the release of "*this*" Green Belt. That failure applies throughout the district.

At Matter 15, you have asked the Council (Site Specific Matters (3)), if North Weald Golf Club was considered as an alternative to sites allocated within the Masterplan Area?

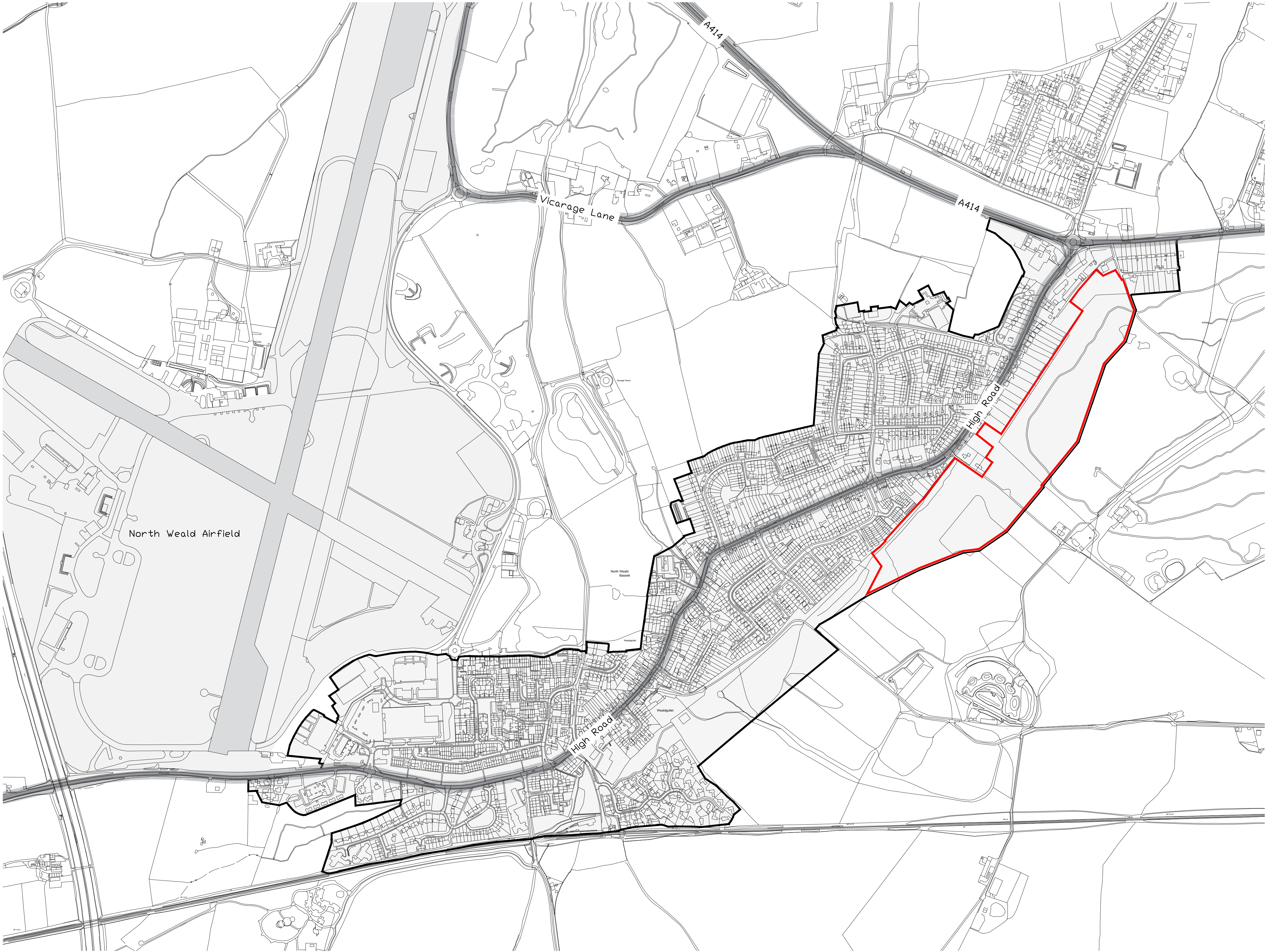
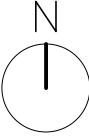
We therefore repeat that our client's site was found to be a more suitable site within the NWB Masterplan area than most of the sites that have actually been proposed for allocation by the Council, including North Weald Golf Club. As such, our client's site should be properly considered and treated at least equally with North Weald Golf Club at the Examination. However, our client should not have to wait until Matter 15 is considered at the Examination. This ongoing prejudice should be remedied in the Matter 5 hearing session.

We should be grateful if you would confirm the steps that you will take to remedy the prejudice being caused to our client by the acts and omissions of the Council in its preparation and submission of the Local Plan.

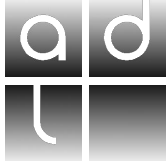
Yours sincerely

A handwritten signature in black ink that reads "Michael Gallimore". The signature is written in a cursive style with a horizontal line underneath the name.

Michael Gallimore
Partner
michael.gallimore@hoganlovells.com
D 0207 050 3400



- Legend:
- Proposed site for housing allocation
 - North Weald Village area
 - Main roads connecting the site



ASHBY DESIGN
LIMITED

13 ARM & SWORD LANE
OLD HATFIELD, HERTS AL9 5EH
T 01707 270 077 W www.ashbydesign.co.uk

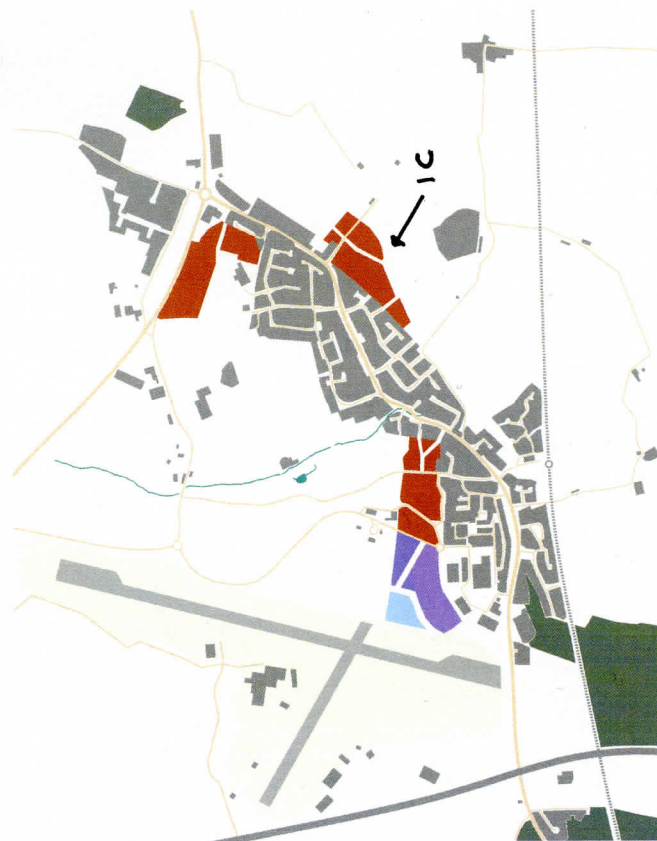
A Site boundary amended following client email dated 04.05.17.

04/05/17 BO

Project Ongar Park Estate North Weald, Bassett	Client The Peer Group PLC
Title Master Plan - Promap	Date May 2017
Scale 1:5000 @ A1	Drawn SRH
	Checked XXX

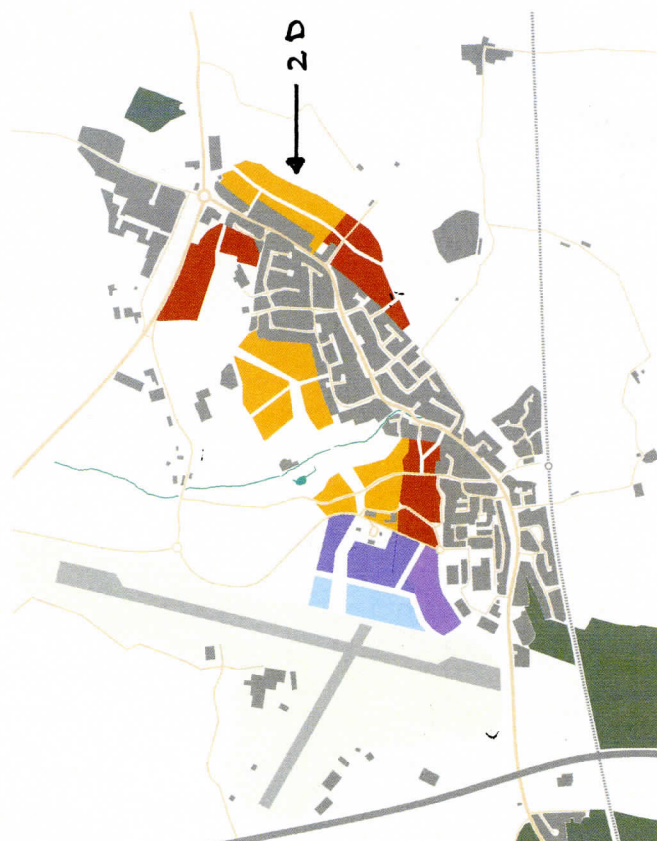
Drawing No.
382/17/Promap-01

Revision
A



Option 1

Developable area: **21.90 ha**
 Net number of dwellings: **458 dwellings**



Option 2

Developable area: **48.67 ha**
 Net number of dwellings: **1021 dwellings**

6.2 GROWTH SCENARIOS

Scenario A

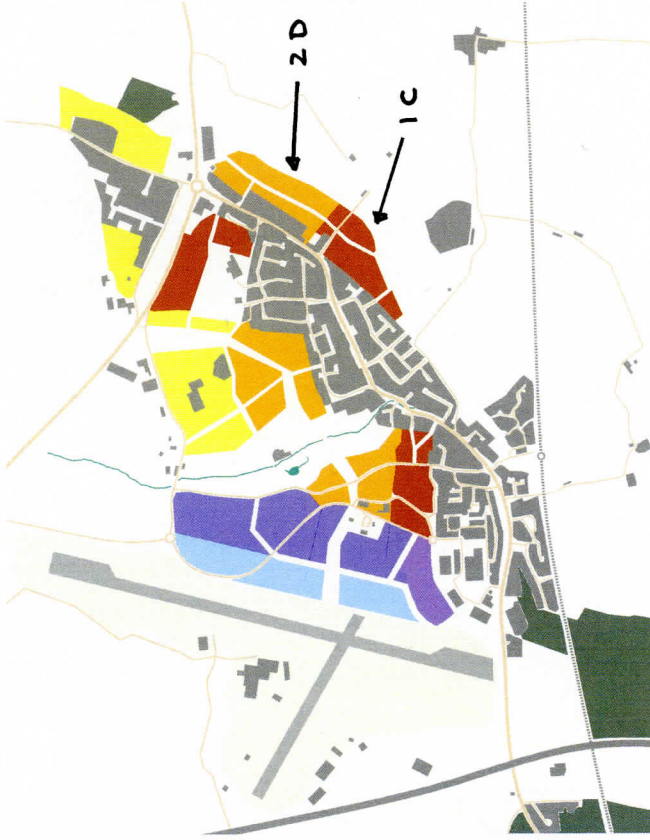
This scenario proposes development both to the north and south of North Weald Bassett. The southern edge has been defined by maintaining the distance of 250m, the length of Emberson Way from the High Road. Here the existing settlement is at its widest and the southern edge to development would seek to maintain but not increase this distance from the High Road.

The extent of growth to the north of the settlement increases incrementally. In option 1 development is close to the existing commercial centre and to the north and east of St Andrew's Primary School retaining the existing playing fields. Growth to the south is up to the edge of Blakes Golf Course.

In option 2 there is further growth to the south of the settlement on the Blakes Golf Course site. To the north of the settlement development is either side of the flood zone along North Brook, observing the 100m Odour Zone of the sewage treatment works.

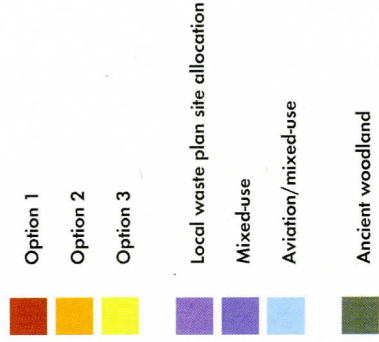
Option 3 sees growth at the northern end of the settlement and around Tylers Green. Green corridors are introduced in all scenarios to allow easy and quick access to the countryside surrounding North Weald Bassett.

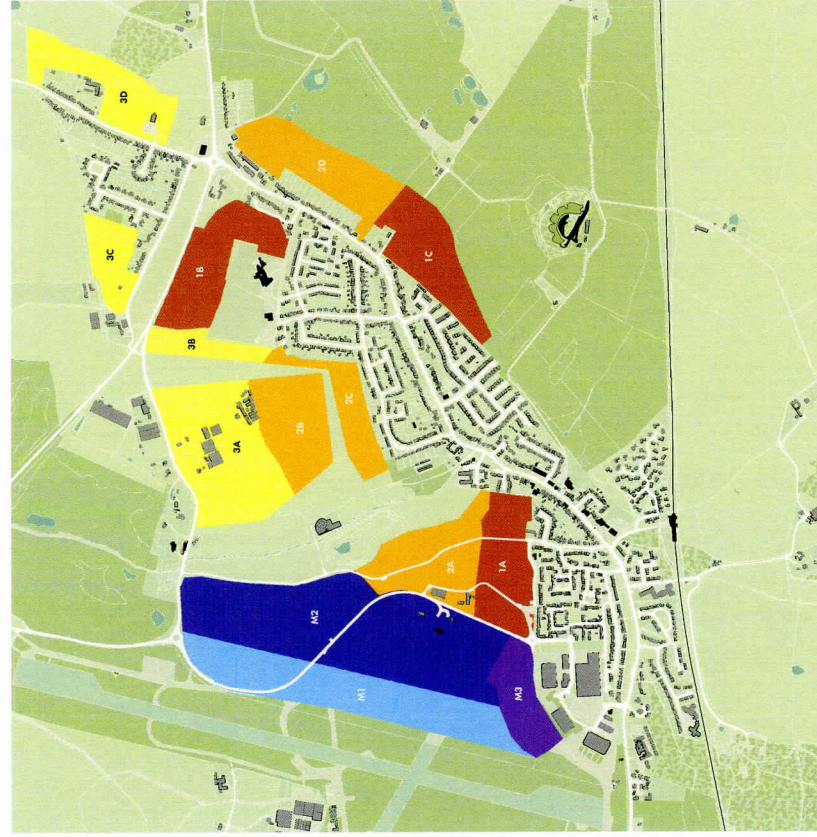
Future Greenbelt boundary considerations are set on page 118.



Option 3

Developable area: **74.37 ha**
 Net number of dwellings: **1540 dwellings**
 Total Mixed use area: **42.77 ha**





Scenario A



Growth Scenario		Name	Dwellings	Private	Affordable	Average Unit Size	Construction Rate	Sales Rate
Option 1	1A	163	98	65	1000	23	23	
	1B	161	97	64	1000	23	23	
	1C	134	80	53	1000	19	19	
	Total	458	275	183				
Option 2	1A	163	98	65	1000	23	23	
	1B	161	97	64	1000	23	23	
	1C	134	80	53	1000	19	19	
	2A	198	119	79	1000	28	28	
	2B	140	84	56	1000	20	20	
Option 3	2C	85	51	34	1000	12	12	
	2D	141	85	56	1000	20	20	
	Total	1021	613	409				
Option 3	1A	163	98	65	1000	23	23	
	1B	161	97	64	1000	23	23	
	1C	134	80	53	1000	19	19	
	2A	198	119	79	1000	28	28	
	2B	140	84	56	1000	20	20	
	2C	85	51	34	1000	12	12	
	2D	141	85	56	1000	20	20	
	3A	237	142	95	1000	34	34	
	3B	78	47	31	1000	11	11	
	3C	86	52	35	1000	12	12	
3D	118	71	47	1000	17	17		
Total	1540	924	616					

Site Suitability Assessment

Site Reference: SR-0269A

Parish: North Weald Bassett

Settlement:

Size (ha): 119.39

Address: Chipping Ongar Park Estate, North Weald Bassett

Primary use: Housing

SLAA notes: None

SLAA yield: 3,950 dwellings and 130,000 sqm commercial

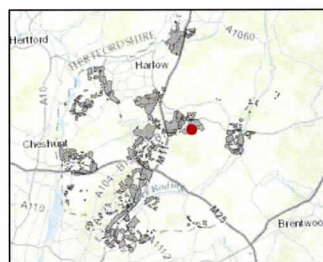
SLAA source for baseline yield: Assumption based on 80:20 housing to employment 30 dph and 0.4 plot ratio for commercial

SLAA site constraints: Masterplan for Chipping Ongar Park North Weald extension includes 200 homes on northern part of site (SR-0029/SR-0031). Remainder may accommodate up to 1,200 homes in total and some employment adopting similar principles.

Site selection adjustment: Site capacity based on an assumption of 1,200 dwellings and 30,000 sqm for entire SR-0269 split proportionally by site size.

Community feedback:	Feedback was received on NWB-4 which is within or near to this site. Refer to Appendix B1.4 for further details.
---------------------	--

Dwellings: 3941



Client

Epping Forest District Council

Job Title _____

Epping Forest District Local Plan

Drawing Status

leave

[illegible]

Drawing No
SR-0269A

ARUP

 Epping Forest
District Council

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Dwellings: 3941			
Criteria		Score	Qualitative Assessment
1.1 Impact on Internationally Protected Sites	0	Effects of allocating the site for the proposed use do not undermine conservation objectives (alone or 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 SSSI'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.	
1.4 Impact on Epping Forest Buffer Land	0	Site is unlikely to impact on Epping Forest Buffer Land.	
1.5 Impact on BAP Priority Species or Habitats	(-)	Features and species in the site unlikely to be retained and effects cannot be mitigated.	The site is wholly within a Wood Pasture and Parkland habitat, and encompasses two further BAP priority habitats, while bordering two more. The site is likely to directly affect the BAP priority habitats, and effects may not be mitigable.
1.6 Impact on Local Wildlife Sites	(-)	Features and species in the site may not be retained in their entirety but effects can be mitigated.	Site encompasses the whole of Ongar Radio Station LWS and Weald Common LNR LWS. The site may directly affect some of the features and species of these LWS but effects can be mitigated. The site is adjacent to Miller's Grove LWS however no effects likely
1.7 Flood risk	(+)	Site within Flood Zone 1.	Some 98% of the site is in Flood Zone 1. Flood Risk Zone 3b, located on the edge of the site, occupies a 2% area. This area can be avoided through site layout.
1.8a Impact on heritage assets	(-)	Proposed site located within a Conservation Area or adjacent to a Listed Building or other heritage asset and effects can be mitigated.	
1.8b Impact on archaeology	(-)	Existing evidence and/or a lack of previous disturbance indicates a high likelihood for the discovery of high quality archaeological assets on the site.	
1.9 Impact of air quality	0	Site lies outside of areas identified as being at risk of 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, low or medium.	
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	0	Site between 400m and 1000m of a bus stop.	
3.3 Distance to employment locations	(+)	Site is within 1600m of an employment site/location.	
3.4 Distance to local amenities	0	Site is between 1000m and 4000m from nearest town, large village or small village.	
3.5 Distance to nearest infant/primary school	0	Site is between 1000m and 4000m from the nearest infant/primary school.	
3.4 Distance to local amenities	(-)	Site is more than 4000m from the nearest secondary school.	
3.7 Distance to nearest GP surgery	0	Site is between 1000m and 4000m from the nearest GP surgery.	
3.8 Access to Strategic Road Network		Not applicable.	
4.1 Brownfield and Greenfield Land	(-)	Majority of the site is greenfield land adjacent to a settlement.	100% greenfield site, adjacent to an existing settlement (North Weald).
4.2 Impact on agricultural land	(-)	Development would involve the loss of the best and most versatile agricultural land (grades 1-3).	
4.3 Capacity to improve access to open space	(-)	Development may involve the loss of public open space with no opportunities for on-site off-setting or mitigation.	38% of open land is within the development site. Given the extent of the public open space and the quantum of development proposed, there may be few opportunities to reconfigure the development and re-provide the public open space elsewhere.
5.1 Landscape sensitivity	(-)	The site falls within an area of high landscape sensitivity - vulnerable to change and unable to absorb development without significant character change.	
5.2 Settlement character sensitivity	(-)	Development could detract from the existing settlement character.	Site is part of Chipping Ongar Park. Site identified in the masterplan as important for the protection of views of North Weald from the Chipping Ongar Redoubt Scheduled Ancient Monument. Any development could need to sensitively bring this asset back into
6.1 Topography constraints	(-)	Topographical constraints exist in the site but potential for mitigation.	
6.2a Distance to gas and oil pipelines	0	Gas or oil pipelines do not pose any constraint to the site.	Less than 2% of the site is in HSE consultation zone 2 in the eastern corner of the site and none of the site is in zone 1. The extent and location of the affected area is considered negligible and does not pose a constraint to development.
6.2b Distance to power lines	0	Power lines do not pose a 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 exists.	Access from private road and April Rise.
6.5 Contamination constraints	(-)	Potential contamination on site, which could be mitigated.	Potential contamination (Radio Station / Military Uses / Farm / Transmitter Station). Potential adverse impact that could be mitigated.
6.8 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 affect congestion.	

SR-0310 – 70.65ha (2,077 dwellings)

Site Suitability Assessment

Site Reference: SR-0310

Parish: North Weald Bassett

Settlement:

Size (ha): 70.65

Address: North Weald Bassett, Blakes Golf Course (East Area)

Primary use: Housing

SLAA notes: Broad Area East of North Weald Bassett comprising Blakes Golf Course.

SLAA yield: 2077 dwellings

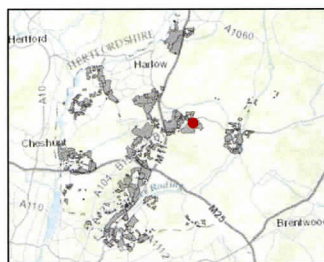
SLAA source for baseline yield: Assumption based on 30 dph

SLAA site constraints: None

Site selection adjustment: None

Community feedback: The Council did not consult on a growth location which covers or is near to this site.

Dwellings: 2077



Client

Epping Forest District Council

Job Title

Epping Forest District Local Plan

Drawing Status

Issue

Drawing No

SR-0310

Issue

P1

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Epping Forest District Council

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 Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroX, GeoEye, AeroGRID, IGN, ERT, Swisstopo, and the GIS User Community



Criteria	Score	Qualitative Assessment
1.1 Impact on Internationally Protected Sites	0	Effects of allocating the site for the proposed use do not undermine conservation objectives (alone or 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 SSSIs.
1.3a Impact on Ancient Woodland	(-)	Site is adjacent to or contains Ancient Woodland but possible effects can be mitigated.
1.3b Impact on Ancient/Veteran Trees outside of Ancient Woodland	0	No Ancient or Veteran trees are located within the site.
1.4 Impact on Epping Forest Buffer Land	0	Site is unlikely to impact on Epping Forest Buffer Land.
1.5 Impact on BAP Priority Species or Habitats	(-)	Features and species in the site may not be retained in their entirety but effects can be mitigated.
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.
1.7 Flood risk	(++)	Site within Flood Zone 1.
1.8a Impact on heritage assets	0	Proposed site located within the setting of a heritage asset and effects can be mitigated.
1.8b Impact on archaeology	(-)	Existing evidence and/or a lack of previous disturbance indicates a high likelihood for the discovery of high quality archaeological assets on the site.
1.9 Impact of air quality	(-)	Site lies within an area which has been identified as being at risk of poor air quality, but it is likely that the risk could be mitigated or reduced.
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, low or medium.
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	0	Site between 400m and 1000m of a bus stop.
3.3 Distance to employment locations	(+)	Site is within 1600m of an employment site/location.
3.4 Distance to local amenities	0	Site is between 1000m and 4000m from nearest town, large village or small village.
3.5 Distance to nearest infant/primary school	0	Site is between 1000m and 4000m from the nearest infant/primary school.
3.4 Distance to local amenities	(-)	Site is more than 4000m from the nearest secondary school.
3.7 Distance to nearest GP surgery	0	Site is between 1000m and 4000m from the nearest GP surgery.
3.6 Access to Strategic Road Network		Not applicable.
4.1 Brownfield and Greenfield Land	(-)	Majority of the site is greenfield land adjacent to a settlement.
4.2 Impact on agricultural land	(--)	Development would involve the loss of the best and most versatile agricultural land (grades 1-3).
4.3 Capacity to improve access to open space	0	Development unlikely to involve the loss of public open space.
5.1 Landscape sensitivity	(--)	The site falls within an area of high landscape sensitivity - vulnerable to change and unable to absorb development without significant character change.
5.2 Settlement character sensitivity	(-)	Development could detract from the existing settlement character.
6.1 Topography constraints	(-)	Topographical constraints exist in the site but potential for mitigation.
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 a 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 exists.
6.5 Contamination constraints	(-)	Potential contamination on site, which could be mitigated.
6.6 Traffic impact	(-)	Low level congestion expected at peak times within the vicinity of the site.

SR-0310 – 70.65ha (2,077 dwellings)

Site Suitability Assessment

Site Reference: SR-0310

Parish: North Weald Bassett

Size (ha): 70.65

Address: North Weald Bassett, Blakes Golf Course (East Area)

Primary use: Residential

Site notes: Broad Area East of North Weald Bassett comprising Blakes Golf Course.

Baseline yield: 2,077 dwellings

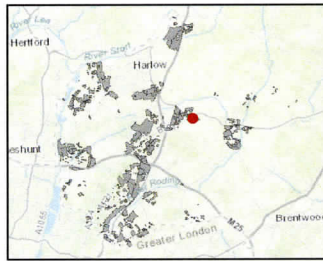
Source for baseline yield: Assumption based on 30 dph

Site constraints: None

Site selection adjustment: None

Community feedback: The Council did not consult on a growth location which covers or is near to this site.

Dwellings: 2,077



Client

Epping Forest District Council

Job Title

Epping Forest District Local Plan

Drawing Status

Date

Issue

March 2018

Drawing No

Issue

SR-0310

Rev 2

ARUP

Epping Forest District Council

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 Sources: Esri, DeLorme, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



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 or 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 SSSIs.
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.
1.4 Impact on Epping Forest Buffer Land	0	Site is unlikely to impact on Epping Forest Buffer Land.
1.5 Impact on BAP Priority Species or Habitats	(-)	Features and species in the site may not be retained in their entirety but effects can be mitigated.
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.
1.7 Flood risk	(++)	Site within Flood Zone 1.
1.8a Impact on heritage assets	0	Site is located within the setting of a heritage asset and effects can be mitigated.
1.8b Impact on archaeology	(-)	Existing evidence and/or a lack of previous disturbance indicates a high likelihood for the discovery of high quality archaeological assets on the site.
1.9 Impact of air quality	(-)	Site lies within an area which has been identified as being at risk of poor air quality, but it is likely that the risk could be mitigated or reduced.
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, low or medium.
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	0	Site between 400m and 1000m of a bus stop.
3.3 Distance to employment locations	(+)	Site is within 1600m of an employment site/location.
3.4 Distance to local amenities	0	Site is between 1000m and 4000m from nearest town, large village or small village.
3.5 Distance to nearest infant/primary school	0	Site is between 1000m and 4000m from the nearest infant/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	0	Site is between 1000m and 4000m from the nearest GP surgery.
3.8 Access to Strategic Road Network		Not applicable.
4.1 Brownfield and Greenfield Land	(-)	Majority of the site is greenfield land adjacent to a settlement.
4.2 Impact on agricultural land	(--)	Development of the site would involve the loss of the best and most versatile agricultural land (grades 1-3).
4.3 Capacity to improve access to open space	0	Development unlikely to involve the loss of public open space.
5.1 Landscape sensitivity	(--)	Site falls within an area of high landscape sensitivity - characteristics of the landscape are vulnerable to change and unable to absorb development without significant character change.
5.2 Settlement character sensitivity	(-)	Development could detract from the existing settlement character.
6.1 Topography constraints	(-)	Topographical constraints exist in the site but potential for mitigation.
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 a 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 exists.
6.5 Contamination constraints	(-)	Potential contamination on site, which could be mitigated.
6.6 Traffic impact	(-)	Low level congestion expected at peak times within the vicinity of the site.

B489

BEDFORD

4 Abbey Court, Fraser Road
Priory Business Park, Bedford. MK44 3WH
bedford@dlpconsultants.co.uk
01234 832 740

BRISTOL

Broad Quay House (5th Floor)
Prince Street, Bristol. BS1 4DJ
bristol@dlpconsultants.co.uk
01179 058 850

EAST MIDLANDS

1 East Circus Street, Nottingham
NG1 5AF
nottingham@dlpconsultants.co.uk
01158 966 622

LEEDS

Princes Exchange
Princes Square, Leeds. LS1 4HY
leeds@dlpconsultants.co.uk
01132 805 808

LONDON

The Green House, 41-42 Clerkenwell Green
London. EC1R 0DU
london@dlpconsultants.co.uk
020 3761 5390

MILTON KEYNES

Midsummer Court, 314 Midsummer Boulevard
Milton Keynes. MK9 2UB
miltonkeynes@dlpconsultants.co.uk
01908 440 015

SHEFFIELD

Ground Floor, V1 Velocity Village
Tenter Street, Sheffield. S1 4BY
sheffield@dlpconsultants.co.uk
0114 228 9190

RUGBY

18 Regent Place, Rugby, Warwickshire
CV21 2PN
rugby.enquiries@dlpconsultants.co.uk
01788 562 233



RTPI

Chartered Town Planner