

ESSENDON PARISH COUNCIL

RESPONSE TO 'THE CALL FOR SITES 2019'

REFERENCE Ess8 (land to the rear of The Vines, High Road, Essendon) and RS2 (land at the Pumping Station at the bottom of Essendon Hill).

The Parish Council held a public meeting on the 5 June 2019 to hear the comments of the local community. Approximately 50 residents attended. They were encouraged to write into WHBC with any comments on the above proposed sites. The PC listened with interest to the points made and, where of planning relevance have used them to inform this submission.

The Parish Council met beforehand to discuss the two sites but did not proffer any view at the public meeting so as not to prejudice any responses from the public. We have the following comments.

We strongly oppose development on either site. The PC is not opposed to development *in principle* within the village or wider Parish - e.g. at Birch Hall Garden Suburb (which is, in part, within our Parish) and assesses each proposal on its own merits. Where infill opportunities are available within the village (such as at School Close), they should be explored.

However, we note and fully agree with the proposition that, in order to meet government housing targets, then allocated land should, in the first instance be found adjacent to urban areas and take the form of urban extensions and not, as proposed in these two sites, as *ad hoc* development within or adjacent to villages.

We understand that sites put forward under 'The Call for Sites 2019' have been instigated by their respective owners as speculative opportunity sites. These and the very many other sites across the Borough will be assessed by WHBC under a 2 Stage process for their appropriateness as allocated sites. This to meet the government housing target for the Borough. We comment as follows under the criteria that is to be used.

Stage 1

1/ Suitability.

Ess8 is clearly back-land development that lacks a safe and suitable access point off the High Road. Visibility is particularly poor as it sits on a blind bend. We cannot see how this could be mitigated, given the inevitable increase in traffic on and off the site that development would entail.

RS2 is not suitable for housing development as it sits within a Flood Plane (see Chapter 14 of the NPPF and WHBC policies). We do not see, given its location, how this could be mitigated.

2/ Availability.

The two areas are in their respective single ownership so this should not be an issue.

3/ Achievability.

We do not doubt that, given house prices in Essendon, that either site might be, for a developer, viable. However, housing need in Essendon is not for houses for sale but for social housing; hence

we would expect this need to be addressed within either site and not off-loaded as a commuted sum. This may impact on viability. In any case, the proposed development would not meet the identified community housing need.

4/ Deliverability.

This could be within any timescale.

Stage 2

1/ Green Belt.

The Green Belt washes over Essendon. We consider that the Green Belt study carried out earlier this year of proposed sites that identified the degree of harm that development would have on the Green Belt for individual sites put forward on previous rounds across the should be updated to provide a comprehensive assessment that would also include the new sites put forward under The Call for Sites 2019 including RS2 and Ess8. This would provide a quasi-objective evidence base for any decisions made by WHBC. Based on that previous study, we consider that Ess8 would cause a High level of Harm to the Green Belt while Rs2 would cause Medium/High level of Harm.

National Policy on development within the Green Belt is found in Chapter 13 of the NPPF. We commend to you Paragraph 134 c), one of the 5 purposes of the Green Belt - *'to assist in safeguarding the countryside from encroachment'*.

We also draw to your attention to the list of exceptions under Paragraph 145 that might make development with the Green Belt acceptable. We consider both proposed sites fall outside these exceptions. As back-land development, Ess8 cannot be considered to be infill – neither, given its scale, is it limited. Infill should be in accordance with the prevailing grain, density and character. Similarly, RS2 cannot be regarded as infill as it is remote from the village.

As such we consider that development within the two sites would not what not meet the criterion for being 'exceptional' and would not, therefore, be appropriate within the Green Belt. We understand with regards to Ess8 that a proposal for 4 houses submitted many years ago was refused on *inter alia* Green Belt grounds. Nothing has changed in the intervening years that might allow for this planning principle to be abandoned.

2/ Sustainability.

We consider that there are major impediments to living a sustainable life in Essendon. There is a very limited public transport service, local facilities are presently limited to the Church, the School, the village hall and, once it reopens after its extensive refurbishment, a pub/restaurant. There are no shops and, consequently, residents are dependent on their cars.

Further development within Essendon of the scale proposed will contravene any reasonable definition of sustainable development.

3/ Heritage.

The centre of the village along the High Road is a designated conservation area, while many of the houses along its length are listed buildings. Any development within that area must comply with sections 66 (1) and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. We

consider that site Ess8, as back-land development, does not comply with the grain, siting or character of historic development within the Conservation Area which is that of traditional linear development of a necklace of housing along a historic road. We consider that the proposed housing would be likely to have a harmful impact on the character and appearance of the Conservation Area and the setting of a number of listed buildings. Apart from the above statutory duties, Chapter 16 of the NPPF Paragraph 196 directs the Council to consider any public benefits that might mitigate the harm caused, but we consider that these are nebulous at best – the clear benefits derived from any development of either site being substantially private. We do not consider that the development of Ess8 could meet the objectives of Paragraph 200 due to its anomalous nature as back-land development.

Conclusion

We note and understand the need for WHBC to cast a wide net in order to demonstrate its efforts to meet the government's housing target for the Borough. We would anticipate that a significant number of the sites put forward by their owners for development under this 'The Call for Sites 2019' exercise would not carry the weight of restraints on development that Ess8 and RS2 do. Consequently, we would advise that those other sites, particularly where they can take the form of urban extensions, are considered first in achieving that target.

Essendon Parish Council strongly objects to the inclusion of either site within any future allocation of sites for development.