

Epping Forest District Council Representations to the Draft Local Plan Consultation 2016 (Regulation 18)

Stakeholder ID	3843	Name	David	Bedford	Dha Planning on behalf of Han Corp
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Date	12/12/2016
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Letter or Email Response:

EPPING FOREST DISTRICT LOCAL PLAN 'PLANNING OUR FUTURE' REGULATION 18 ISSUES AND OPTIONS CONSULTATION
On behalf of our client, **...Redacted...**, please accept this letter as our formal response to the current Local Plan Regulation 18 Consultation. Background We understand that Epping Forest District Council is in the process of preparing a new Local Plan to set out a strategy for development for the period up to 2033 and that the Council is asking for views on a draft plan as part of the preparation process. Our client controls land at Nazeing Golf Club, Middle Street, Nazeing, which we believe represents an opportunity to include as a strategic residential allocation as the Local Plan progresses. Given the stage of the process, the comments predominantly relate to the emerging draft policies/strategy. However, we also take this opportunity to enclose a separate appraisal of our client's land, detailing its suitability and availability, which we hope that this helps influence the next stages of the process. Representations The Draft Vision for the District We understand that the draft vision for the district states that by 2033 Epping Forest District will be a place where: • residents continue to enjoy a good quality of life; • new homes of an appropriate mix of sizes, types and tenures to meet local needs have been provided and well integrated communities created; • development respects the attributes of the different towns and villages; • development needs will be met in the most sustainable locations; • Epping Forest will be conserved and enhanced; • the recreational aims of Lee Valley Regional Park are supported; • a more sustainable local economy including tourism, aviation, research and development, food production will be developed; • a distinctive and attractive network of town and village centres will have been maintained; • access to places by public transport, walking and cycling will be promoted; and • significant residential development will be located near Harlow to support the economic regeneration of the town. We support the principle of these objectives, albeit we would suggest some minor modification to ensure the plan is positively prepared and is fully aligned with the provisions of the National Planning Policy Framework (NPPF). Specifically, we consider some objectives should be modified to provide more certainty that the full 'objectively assessed' housing need will be met. We consider the objective should be modified to read (with our additions in bold): 'By 2033 Epping Forest District will be a place where: • existing and future residents continue to enjoy a good quality of life; • new homes of an appropriate mix of sizes, types and tenures to meet full objectively assessed needs have been provided and well integrated communities created; • development provides proportionate growth in such a way that would respect the attributes of the different towns and villages; • development needs will be met in the most sustainable locations having regard to the ability to plan for a new village and urban extensions to upgrade existing settlements lacking in community and social infrastructure; • Epping Forest will be conserved and enhanced; • the recreational aims of Lee

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Valley Regional Park are supported; • a more sustainable local economy including tourism, aviation, research and development, food production will be developed; • a distinctive and attractive network of town and village centres will have been maintained; • access to places by public transport, walking and cycling will be promoted; and • significant residential development will be located near Harlow to support the economic regeneration of the town and throughout all areas of the District to ensure a proportionate level of growth for existing settlements. Whilst we acknowledge that most of the District is within the Metropolitan Green Belt, and other constraints apply, the NPPF makes provision for settlement boundaries to be altered in exceptional circumstances as part of the preparation or review of a Local Plan. We therefore consider our amended vision is achievable. From a planning perspective we do, of course, agree the importance of maintaining the open character of the Green Belt. However, the 'objectively assessed need' for 514 new homes per year undoubtedly represents the exceptional circumstances that warrants the release of some Green Belt land, and we consider this should be well-planned and should be distributed around larger villages such as Nazeing where it could deliver much needed enhancements to the benefits of existing and future residents. In this respect, we would stress that local planning authorities must take account of both the need to promote sustainable patterns of development and wider sustainability issues, for example the creating of attractive homes where people wish to live. In summary, the plan review is an opportunity to genuinely use Green Belt land to both help accommodate the unprecedented need for growth, but to identify settlements deficient in services and use the opportunity to remedy this as far as possible. For this reason, we favour a strategy based on a greater level of growth in Nazeing, which is both a desirable and sustainable for higher levels of growth yet needs an upgrade of community facilities.

Green Belt Amendments We note that within the draft Local Plan, the Council is pursuing a strategy which seeks to minimise the use of Green Belt land for development whilst focusing development in the most sustainable locations. However, it also acknowledges that insufficient land exists outside the Green Belt exists to meet the development needs of the District within the Plan period. Accordingly, boundary alterations are proposed to allow for proposed site allocations needed to deliver the Local Plan Strategy. We welcome this acknowledgement, but feel that any Green Belt releases should be limited to a lesser number of larger sites. This is because a strategy dominated by small to mid-sized sites would not generate the critical mass required for significant improvements to infrastructure (schools, highways and healthcare) to benefit existing and new communities. Whilst release of smaller pockets of land may seem less evasive, they ultimately fail to deliver the benefits of larger housing schemes, including affordable housing and wider social infrastructure. For this reason, we consider impact upon openness is an important factor in considering Green Belt release, but ultimately such boundary amendments should take place in the most sustainable locations in line with the Government's core objectives for planning. Strategy for Nazeing Draft policy SP2 states that within the period 2011-2033 the Council will provide for approximately 11,400 new homes and approximately 10,000 new jobs through the Local Plan. The new homes will be delivered throughout the borough, including 220 new homes in Nazeing. The Draft Local Plan goes on to say that based on the findings from community consultation, stakeholder engagement and evidence based documents, the following vision is proposed for Nazeing: 'Nazeing will maintain its rural character, with a new community centre acting as a focal point for the settlement. The village will continue to support a thriving agricultural and horticultural economic base, supported by the glasshouse industry, and seek opportunities to improve the highway network in order to ease congestion'. We dispute the notion that Nazeing is a village of rural character given the distinctly urban feel and population in excess of 4,000 people. Furthermore, we consider it is a settlement that is in need of a sustainable natural extension in order to provide a much greater range of local facilities to support its residents and reduce the need to travel. For this reason, we consider a much greater level of growth should be promoted for Nazeing to ensure that the necessary improvements are delivered in line with para 52 of the NPPF.

Duty to Cooperate In the context of Epping Forest District, we note that there are ten adjoining local authority neighbours; Brentwood, Chelmsford, Harlow, Uttlesford, Broxbourne, East Hertfordshire, Enfield, Havering, Redbridge and Waltham Forest. We are not aware of any published information from these LPA's that suggest they are receptive to accommodating external development pressures. Indeed, we know that some of these are seeking contributions to their own requirements from other authorities. Under the circumstances, we feel EFDC is well placed to accept further levels of housing through the Duty to Co-operate and could accommodate some of this via the urban extension of Nazeing given the availability of our client's land.

Summary Taking all of the above into consideration, we support the thrust of the draft plan insofar as it seeks to deliver the full objectively assessed housing need of the area and accepts that Green Belt release is needed to accommodate growth. However, we consider a sound planning case exists to support the sensitive release of our client's land as part of the ongoing plan review. Our client's land could accommodate in the region of 1,000 well planned homes and a wide range of community enhancements to the village

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of Nazeing in a location that would be both sustainable and desirable. Furthermore, the site has a potential role to play in helping to meet the development needs of neighbouring authorities as part of the duty to cooperate.