

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

<b>Stakeholder ID</b>	3838	<b>Name</b>	Danniella Persaud	<b>Savilles on behalf of Mrs Jean Jones</b>
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<b>Method</b>	Letter
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<b>Date</b>	12/12/2016
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### Letter or Email Response:

EPPING FOREST DISTRICT DRAFT LOCAL PLAN CONSULTATION 2016 LAND NORTH OF ABRIDGE ROAD, THEYDON BOIS (REF. SR-026C) I write on behalf of my client and ...Redacted..., in relation to the above site. We write in response to the consultation currently being held by Epping Forest District Council (EFDC) in relation to the Draft Local Plan. The Local Plan will establish strategic policies to guide development in the District, supported by themed district wide policies, development management policies and place specific policies and site allocations. As a general comment, we note that the National Planning Policy Framework (NPPF) requires all Local Plans to be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally. The NPPF states that local planning authorities should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change. They should be consistent with the principles and policies of the NPPF and should be aspirational but realistic. Paragraph 158 of the NPPF requires the use of a proportionate evidence base which provides adequate, up-to-date and relevant evidence about the economic, social, and environmental characteristics and prospects of the area. Paragraph 173 requires careful consideration of viability and costs. Plans should be deliverable and the scale of development identified in the Plan should not be subject to such obligations and policy burdens that their ability to be developed viably is threatened. The Site The site is located within Theydon Bois, to the north of Abridge Road and to the east of the railway line. The site comprises open fields with some hedgerow planting marking field boundaries. To the west of the site, beyond the railway, is the eastern part of the settlement of Theydon Bois comprising residential dwellings, a local centre and Theydon Bois London Underground Station. To the north, east and south of the site are predominantly open fields. Adjacent to the site to the northeast is open land which has been subject to engineering operations. The site is located within Flood Zone 1 and is designated as Green Belt. The site is not located within a Conservation Area. To the southeast of the site, less than 100 metres from the site boundary, is a Grade II listed farmhouse and associated barn: 'Parsonage Farmhouse' and 'Barn 10 Metres North of Parsonage Farmhouse'. The site was put forward by the landowner as part of the Council's Call for Sites exercise. Comments on the Draft Local Plan We welcome the identification of Theydon Bois as a location for housing growth and the proposed allocation of the site for the development of 121 residential dwellings within draft Policy 8 seeks. However, we note that a larger site was promoted by the landowner; this comprises an area of approximately 10 hectares and has the capacity to deliver approximately 400 residential dwellings, as identified within the Indicative Capacity Assessment in the Site Selection Report (2016). In light of the factors set out below, we consider that the allocation should be

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extended to include the wider site in order to ensure the most efficient use of this sustainable location and to meet local housing needs. **Site Location** The site is located adjacent to the existing settlement of Theydon Bois and therefore comprises an ideal extension. This would be in accordance with EFDC spatial strategy for the District which seeks to maximise growth around existing settlements. In addition, Paragraph 5.140 (part of the text supporting draft Policy P 8: Theydon Bois) supports the expansion of the settlement to the northeast and recognises that this provides an opportunity to provide new residential dwellings close to Theydon Bois Underground Station, while minimising potential harm to the Green Belt, landscape and environmental designations around the settlement. Draft Policy SP 4 seeks to make the best and most efficient use of land through a greater intensity of development at places with good public transport accessibility. The site comprises an excellent location in this regard and therefore it would be appropriate to maximise development at this location by extending the allocation to include the wider site. We note that Paragraph 5.139 sets out the aspiration for Theydon Bois to retain its local feel and character which does not accord with draft Policy SP 4. **Site Assessment** In the Site Selection Report (2016) the site was considered to be unconstrained being located within the settlement buffer zone; outside of Flood Zone 3; outside of a designated site of importance to biodiversity; not constrained by Epping Forest; and outside HSE Consultation Zones Inner Zone. Whilst the site scored poorly against some of the more detailed criteria, such as impact on biodiversity, landscape sensitivity, topographical constraints and access, it was considered that it would be possible to overcome these constraints. It should be noted that one of the identified site constraints specifically, that the site is valuable and versatile agricultural land, is not applicable as the site is currently used for grazing only and is not viable for intensive agriculture, particularly given its size. The Indicative Capacity Assessment of the site indicated that the baseline yield of the site was approximately 400 dwellings but that the density of any development on the site should be reduced to take account of constraints including trees (10% reduction) and local setting (58% reduction). It was considered that development should be limited to the western half of the site, equating to approximately 70% of the site area, and that the surrounding rural setting required lower densities. These reductions resulted in the net capacity and subsequent allocation of the site for 121 dwellings. Whilst there are trees on the site, these can be preserved and incorporated within the design of the development where appropriate in line with an assessment of the condition of the trees and their contribution to the local landscape. This will not require a 10% reduction in density as has been applied in the Site Selection process. The development can be carefully designed to take account of local character with reduced densities at the south of the site along Abridge Road and at the east of the site. This will create a step down in density between the more built up centre of Theydon Bois to the west and the more dispersed nature of the dwellings to the east on Abridge Road. The 58% reduction in density applied in the Site Selection process is excessive and unnecessarily reduces the potential capacity of the site. We acknowledge that the site is located in a Primary School planning area with a current or forecast deficit and where schools have limited ability to expand. Any impact of the development of the site on local education provision will be addressed through infrastructure payments; the increase in the developable area of the site will not prevent this approach to mitigation. Many of the other identified constraints, such as impacts on landscape sensitivity, can be mitigated through detailed design. Initial highways work undertaken indicates that sufficient visibility splays can be provided to Abridge Road to provide vehicular access from this location. EFDC Green Belt review assessed the contribution of the parcel of Green Belt in which the site is located (Parcel 041.4) against each of the purposes as follows: • To check the unrestricted sprawl of large built-up areas - no contribution • To prevent neighbouring towns merging into one another - moderate contribution • To assist in safeguarding the countryside from encroachment -strong contribution • To preserve the setting and special character of historic towns - no contribution Whilst the summary of the harm from release of the parcel from the Green Belt was considered to be very high, this was reduced to moderate harm when the third purpose is discounted. We further consider that, given the development of the site will be restricted by strong natural boundaries, and that there is an extensive distance between Theydon Bois and any settlement to the east, the removal of the wider site from the Green Belt is acceptable. Overall the site is considered to be a relatively unconstrained site; where there are constraints these can be overcome through detailed design work. The wider site is no more constrained and the expansion of the allocation will allow for the most efficient use of this site in a highly sustainable location. In addition, initial highways investigations demonstrate that the site can be accessed safely off Abridge Road and as such it is considered there are no barriers to the timely delivery of the site. **Housing Need** Policy SP 2 sets out a housing target for the District of approximately 11,400 new homes. Upon review of the Opinion Research Services (ORS) report 'Updating the Overall Housing Need: Based on 2014-based projections for West Essex & East Herts' dated August 2014, it is clear that the Draft Local Plan does not consider the revised Objectively Assessed Need (OAN) for the District of 13,278, as identified in the ORS

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report; an addition of some 1,800 dwellings above the target set out in Policy SP 2. Furthermore, we consider that even this OAN does not accurately reflect the need to accommodate housing requirements for London and does not take account of persistent under delivery of housing within EFDC, both of which has led to increased housing need in the District. This needs to be addressed in the next iteration of the Plan. We note that the Council acknowledge that the OAN is not fixed, as stated in the Developer Meeting on 2 December 2016, and subject to change following the outcome of the Local Plans Expert Group report to the Communities Secretary and Minister of Housing and Planning, and the potential forthcoming standard common methodology for the calculation of OAN. However, it is considered that the Council need to address this and publish their full methodology prior to the next consultation stage. This, in our view, will lead to an increase in the OAN for the District and as such more sites will need to be allocated for development. Policy SP 2 also sets out the spatial strategy for the location of new development within the District. The strategy focuses on the delivery of new homes through the development of sites around Harlow supported by development around other identified settlements, including Chigwell. The Plan identifies approximately 3,900 dwellings for delivery on sites around Harlow, however this strategy is significantly undermined by the decision by Harlow Council in August 2016 to not support the provision of dwellings in these locations. This serves to reiterate the need for EFDC to increase the housing target for the District and revise the proposed housing strategy and allocations in order to ensure the delivery of sufficient housing throughout the District and to meet the identified needs, as required by the NPPF. This will result in additional housing allocations. Delivery of Allocated Sites Having reviewed some of the other sites which are proposed to be allocated, we note that some sites may not be deliverable to the extent currently envisaged. Some of the sites proposed to be allocated for residential development are currently in use and there has been little / no assessment to date of the demand for the existing use in the consideration of the loss of such uses to enable the subsequent delivery of residential dwellings. In Theydon Bois specifically, two of the proposed allocated sites (Refs. SR-0228i and SR-0228ii) are existing station car parks and are proposed to provide a combined total of approximately 50 homes, as well as retained car parking. However, the existing car parks are both at capacity and there is no reduction in the residential capacity of the site to ensure sufficient car parking is provided within redevelopment proposals to meet demand. In addition, some of the allocations comprise existing open space. This is in conflict with draft Policy DM 6 which seeks the retention of open spaces. Whilst the policy allows for partial loss where this is considered justified, the open nature of the site should be maintained. We consider that the need to retain open space on these allocated sites has not been fully acknowledged within the capacity and deliverability assessments undertaken. The residential development which could be lost where these allocated sites are not delivered could be accommodated on our client's site through the extension of the allocation to include the wider site. The site is deliverable immediately and as noted above is subject to few constraints. Summary We welcome the proposed allocation of our client's site and the identification of Theydon Bois, particularly the area to the northeast of the settlement adjacent to the Underground Station, as an area of housing growth. Given that the site is deliverable immediately, relatively unconstrained and located in a highly sustainable location, the site has the potential to accommodate additional dwellings to make a much needed increased contribution to the District's housing supply. In addition, the expansion of the site allocation will create a more coherent development comprising good spatial planning and will result in a more natural boundary to the site and the settlement in line with the existing site boundary. Furthermore, the client acknowledges the other site allocations proposed to the north of the site and appreciates the need to work collaboratively with adjacent landowners to deliver successful sustainable development. We trust that the above is of assistance. We would like to be kept up to date with progress and look forward to further opportunities to engage. We look forward to confirmation of receipt of these representations. Please feel free to contact me if you have any queries or would like to discuss.

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