

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

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Method	Letter				
Date	12/12/2016				

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Letter or Email Response:

Introduction and background 1. These representations on the Epping Forest District Draft Local Plan 2016 (DLP) are submitted by **REDACTED**. A plan showing the site is provided as Appendix 1 to this representation. It should be noted that the site abuts the proposed residential allocation, site SR-0069. 2. It is proposed that land at Bridge Hill, Epping be allocated for residential development, to form part of the wider proposed allocation of SR-0069. 3. The site adjoins the existing settlement boundary of Epping, on the southern side of the town, and is a greenfield site located to the rear of existing residential gardens serving dwellings on Bridge Hill. 4. The site measures approximately 0.35 ha and is not subject to any physical constraints that would restrict its potential development for housing. It is located within Flood Zone 1 - land least at risk of tidal or fluvial flooding, and suitable for any type of development from a flood-risk perspective. It is not within or near any areas subject to any environmental or ecological designations that would be restrict its deliverability. 5. The site is located immediately to the north, and adjacent to, site SR-0069 in the EFDC plan-making process. Following a rigorous site assessment process, site SR-0069 was identified by EFDC as being suitable for residential allocation, and is proposed as such through the DLP. The site that is subject of these representations is sandwiched between proposed allocation SR-0069 and the existing residential enveloped of Epping. It is considered that this site represents a logical extension to the proposed allocation SR-0069, one which would help meet the District's housing needs, and address a potential anomaly in respect of a new Green Belt boundary. Approach to identifying and meeting housing need 6. The new Local Plan is required to allocate additional land for housing, and to deliver a significant uplift in current housing delivery rates in the District. 7. The National Planning Policy Framework (NPPF) is clear on the importance of housing delivery, and on the need for planning to deliver objectively assessed housing needs. The core planning principles set out in the NPPF include the following: "Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities" (NPPF paragraph 17). 8. In addition, the NPPF contains an express requirement (paragraph 182) for Local Plans to be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development - a Local Plan cannot be found sound and adopted if it fails this requirement. 9. Given that it is critical for the Local Plan to seek to meet objectively assessed housing needs in full, we have concerns regarding the approach advocated by the DLP: the DLP suggests the objectively assessed need was identified as 46,100 for 2011 to 2033 for the housing market

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area of East Herts, Epping Forest, Harlow and Uttlesford through a Strategic Housing Market Assessment published in 2015. Of this figure of 46,100, a need of 11,300 was identified for Epping Forest District. However, in 2016, the Government released revised population and household projections. In August 2016 Opinion Research Services (ORS) updated the overall housing need to take into account more recent information, including the more up-to-date 2014-based household projections, and identified a revised objectively assessed housing need for the housing market area of 54,608 between 2011 and 2033. The update goes on to state that the objectively assessed housing need for Epping Forest District is 13,278 dwellings. As such, it is clear that if the EFDC Local Plan is to be found sound, additional land to that proposed in the DLP will have to be allocated for housing. Draft Policy SP2 10. Draft Policy SP2 proposes a level of housing growth that would require review of the Green Belt boundary. EFDC has undertaken a review of the amount of residential development that can be accommodated within District through various sources of supply. EFDC's evidence base has clearly demonstrated that objectively assessed housing needs cannot be met without review of the Green Belt boundary and the allocation for housing development of some land currently allocated as Green Belt in the current, but out-of-date, Development Plan. 11. As such, it is clear exceptional circumstances exist which justify review of the Green Belt boundary through the Local Plan, as per paragraph 83 of the NPPF. 12. Having regard to the above, the principle of reviewing the Green Belt boundary and allocating land for housing through the Local Plan is supported. This approach is supported by national policy, and is necessary in order to prepare a sound Local Plan. 13. Draft Policy SP2 of the DLP sets out the proposed housing distribution strategy for the District. As noted above, it will be necessary to plan for more new homes than proposed through the DLP. However, the principle of directing a significant proportion of the District's housing need to the town of Epping is supported. As noted in the DLP, Epping has been identified as a top-tier settlement in the District's settlement hierarchy. It benefits from a range of services, facilities and employment opportunities and, as such, represents a sustainable location to accommodate additional housing growth. Draft Policy 14. Following on from Draft Policy SP2, Draft Policy P1 of the DLP proposes allocation of specific sites for specific numbers of dwellings. 15. This includes proposed allocation of site SR-0069 ((land at Ivy Chimneys Road) for approximately 79 homes. This site has been through a rigorous assessment process in order for it to have been identified as being suitable, achievable and available for allocation for housing. This included considered of the site against a number of sustainability criteria. It should be noted that land at Bridge Hill, Epping would perform equally well when subject to this assessment process. As a site immediately adjacent to SR-0069, it shared the characteristics that make SR-0069 a sustainable housing location. 16. Furthermore, it should be noted that land at Bridge Hill, Epping is sandwiched between the existing settlement boundary of Epping and proposed allocation SR-0069. It is necessary to consider the impact of failing to allocate land at Bridge Hill, and the effect of this on the integrity of the Green Belt. 17. The NPPF is clear on the purposes of allocating land at Green Belt, setting out the following five purposes of Green Belt land at paragraph 82: • 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; and • to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. 18. If land at SR-0069 is allocated for housing, clearly land at Bridge Hill would no longer serve the purposes of including land in the Green Belt. It should therefore be removed from the Green Belt as part of the Local Plan process, to ensure the integrity of the District's Green Belt is retained. 19. As noted earlier within this representation, the DLP does not propose to deliver a sufficient number of new homes to meet objectively assessed housing need. The Local Plan must seek to provide for greater numbers of new homes if it is to be found sound. As site SR-0069 has already been identified as being suitable for residential, given that the characteristics that led to this conclusion also apply to land at Bridge Hill, and in light of the fact land at Bridge Hill would no longer contribute to the purposes of the Green Belt, this site should be allocated for residential development along with SR-0069. 20. The detailed layout and development of land at Bridge Hill would be tailored to integrate with that of SR-0069. 21. The Local Plan is required to be positively prepared and justified. Land at Bridge Hill's continued designation as Green Belt given the proposed allocation of SR-0069 is not justified. Its allocation for residential use will help ensure the Local Plan is positively prepared, assisting in meeting the District's housing needs. Overview and conclusion 22. The DLP fails to meet the District's objectively assessed housing need. If the Local Plan is ultimately to be found sound, it must plan for a greater number of new homes than the DLP proposes. 23. Epping is a top-tier settlement and represents a sustainable location to direct a proportion of the District's housing growth. 24. Site SR-0069 has been subject to a rigorous assessment process and found to be a sustainable site for residential allocation. Its allocation would, however, leave an anomalous small wedge of Green Belt land sandwiched between two residential areas. This land would no longer perform a Green Belt function as per paragraph 80 of the NPPF, and its continued allocation as

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Green Belt would be unjustified. In light of the need for additional land for housing to be allocated, and the fact SR-0069 has already been identified as suitable for residential use, it would be justified, effective and consistent with national policy to also allocate land at Bridge Hill for residential development. This would also assist in ensuring the Local Plan for Epping District is positively prepared