

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

Stakeholder ID	4844	Name	Olivier	Spencer (on behalf of ADT Fletcher & The Red Trust)
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Method	Survey
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Date	
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Survey Response:

1. Do you agree with the overall vision that the Draft Plan sets out for Epping Forest District?

Agree

Please explain your choice in Question 1:

Our client supports the approach set out in 'The Draft Vision for the District' on page 30 of the Draft Local Plan, which accords with the core planning principles set out in paragraph 17 of the National Planning Policy Framework (NPPF). However, it is notable that some of the site allocations in subsequent sections of the Draft Local Plan do not comply with this Vision. In particular, the fourth bullet point in the Vision states that: "development needs will be met in the most sustainable locations". Land to the north of Epping is amongst the most sustainable location in the District to accommodate growth and yet despite this, other less well connected, less well served and more environmentally sensitive locations have been identified for growth in the Plan. These sites are the subject of specific objections elsewhere in these representations.

2. Do you agree with the overall vision that the Draft Plan sets out for Epping Forest District?

Strongly disagree

Please explain your choice in Question 2:

Our client objects to the disproportionately low number of new dwellings (1,640) that are allocated to Epping (town) and the high number (1,580) to North Weald Bassett, in Policy SP2 of the Draft Local Plan. This approach, which is inconsistent with the Vision contained on page 30 of the Draft Local Plan, does not allocate sufficient growth to the more sustainable of the two locations - i.e. Epping. It also fails to have sufficient regard to the range of services and facilities available in Epping and the absence of those same services and

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facilities in North Weald Bassett. For example, Policy E2 confirms that Epping sits at the very top of the retail hierarchy with its main “Town Centre”, whereas North Weald Bassett has no defined centre at all.

3. Do you agree with the proposals for development around Harlow?

No opinion

Please explain your choice in Question 3:

4. Do you agree with the proposed shopping area in...

Epping?

No opinion

Buckhurst Hill?

No opinion

Loughton Broadway?

No opinion

Chipping Ongar?

No opinion

Loughton High Road?

No opinion

Waltham Abbey?

No opinion

Please explain your choice in Question 4:

5. Do you agree with the proposals for new employment development?

No opinion

Please explain your choice in Question 5:

6. Do you agree with the proposed sites in your area?

Epping (Draft Policy P 1):

No

Please provide reasons for your view on Epping:

Our client objects to the proposed allocations set out in Policy P1, which are based on a flawed spatial strategy for Epping. The majority of peripheral growth around Epping is directed to the south and to the east

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of the town. Local Plan paragraph 5.15 suggests that: (i) expansion to the south is the least harmful to the Green Belt and the surrounding landscape and would provide opportunities to promote residential development in close proximity to Epping Station; and, (ii) although expansion to the east is less favoured, this location provides opportunities for sustainable expansion of the settlement in close proximity to Epping Station and the town centre. However, these conclusions are not supported by EFDC's evidence base and there are sound planning reasons why development would be more suitable elsewhere. Firstly, the evidence base actually confirms that the allocated sites to the south of the town are likely to cause the greatest harm to the Green Belt. This is set out in Table 4.1 of EFDC's Green Belt Assessment: Stage 2, prepared by LUC in August 2016, which scores land to the south of Epping, i.e. sites SR-0069/33, SR-0113B and SR-0208, as "very high" for harm to the Green Belt. Whereas land to the north of Epping, i.e. sites SR-0132Ai and part of SR-0132Bi, which has not been allocated for development, only scores "high" for harm to the Green Belt. Furthermore, land to the south of the town also performs the vital and original purpose of the Metropolitan Green Belt - i.e. to maintain separation between Greater London and other outlying settlements. These sites, along with another proposed allocation to the north east of Theydon Bois, will erode the Green Belt gap between the two settlements. This is contrary to both Local Plan (2016) paragraph 5.12 which defines the gap as being "important" and the previous iteration of the Local Plan (2012) which identified a "Strategic Green Belt Gap" in this location. Secondly, the evidence base confirms that the allocated sites to the east of the town are the most sensitive in landscape terms. Figure 2.4 in the Settlement Edge Landscape Sensitivity Study, prepared by Chris Blandford Associates in 2010, identifies that land to the east of Epping, i.e. sites SR-0071 and SR-0153, has "high" landscape sensitivity. It is therefore more sensitive than land to the north, i.e. sites SR-0132Ai and SR-0132Bi, which has "moderate" landscape sensitivity. Thirdly, the evidence base directs that several of the allocated sites to the south and east of the town are less "suitable" for development than land to the north. Appendix B1.4.2 of the Report on Site Selection, prepared by Arup in September 2016, rates: - Site SR-0071, to the east, with 15 negative scores for site suitability; - Site SR-0069/33, to the south, with 14 negative scores for site suitability; - Site SR-0208, to the south, with 13 negative scores for site suitability; and yet - Site SR-0132Ai, to the north, has only 12 negative scores for site suitability. Even Site SR-0132Bi, also to the north, has 14 negative scores and performs better than Site SR-0071 and no worse than Site SR-0069/33. Fourthly, although allocations to the south and east of the town are in close proximity to Epping Station, they are a much further from Epping's only secondary school and a variety of community uses and facilities located in the northern part of the town. Development to the south and east is also likely to direct additional vehicle movements through the already heavily congested Station Road / High Street mini roundabout, which is the only realistic vehicular route to the town centre and onwards towards M11 J7. Our client also objects to a number of the allocations to the south and east of the town for the following site-specific reasons: Site SR-0208 is dominated by existing woodland and a designated Local Wildlife Site, making it inherently unsuitable for development. Planning permission was also refused on the site in 2011 due to anticipated harm to the openness of the Green Belt. Site SR-0071 comprises small fields and existing woodland, on steeply sloping land, which does not lend itself well to residential development. Furthermore, the previous iteration of the Local Plan (2012) confirmed that there are a number of protected trees throughout the site and that it comprises sensitive pre-18th Century landscape. Site SR-0153 has "high" landscape sensitivity and according to the previous iteration of the Local Plan (2012) would require significant infrastructure investment. No such investment is identified in the latest Local Plan draft or this allocation. As stated, Sites SR-0069/33 and SR-0113B will erode the strategic Green Belt gap between Epping and Theydon Bios to the south. Furthermore, there are also likely to be air quality and noise issues associated with proposing development in such close proximity to the M25. In summary, the spatial strategy for Epping and many of the allocations set out in Policy P1 fail the soundness test of being "justified", as required by paragraph 182 of the National Planning Policy Framework (NPPF), on the basis that they are not the most appropriate strategy when considered against the reasonable alternatives and are not based on clear evidence. Our client submits that in order to ensure that the Local Plan is "justified" and therefore "sound", EFDC should revisit and revised the spatial strategy for Epping, including less development and fewer allocations to the south and east of the town. In their place, new allocations should be identified to the north of Epping - namely our client's land at sites SR-0132Ai and SR-0132Bi. Even according to EFDC's own evidence base, land to the north of the town would cause less harm to the Green Belt, has a lower landscape sensitivity

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and is more suitable for strategic development. Site SR-0132Ai extends to 5.94 hectares and could accommodate 175 dwellings, including affordable homes, with vehicular access provided to the north from Lindsey Street via other land in our client's ownership. This site is in very close proximity to the town centre, the town's primary and secondary schools and the strategic highway network via M11 J7. The immediate area is also served by several existing bus routes, which provide regular services to Epping Station, Ongar, Roydon, Harlow and Toot Hill. Although the site is located within the Metropolitan Green Belt, it is less harmful to the Green Belt than that currently allocated to the south and less sensitive in landscape terms than that currently allocated to the east. There are also no other environmental or policy constraints to limit development here. The site could accommodate a natural extension to the Epping urban area and logically round off this part of the town. Furthermore, there is potential to strengthen the existing field boundaries to the north, east, south and west of the site to limit any visual impacts, to preserve the wider openness of the Green Belt beyond and to protect the amenity of existing properties nearby. Site SR-0132Bi measures 31.29 hectares and could accommodate 720 dwellings, including affordable homes. The site is well located and has excellent access opportunities to Lindsey Street to the northeast and Bury Lane to the southwest. The site is also in very close proximity to the town's primary and secondary schools, the town centre, the strategic highway network and existing bus services. Notably this site is less sensitive in landscape terms than the land currently allocated to the east of the town and part of it is less harmful to the Green Belt than that to the south of Epping. Although not directly abutting the town, this site could be developed within a country park setting, with a large swathe of open space, woodland and green land acting as a buffer between the proposed and existing residential neighbourhoods, and permeating through the centre of the site to provide recreational space and sustainable foot and cycle connections to the countryside to the north. Further information on our client's land is set out in the enclosed Promotional Planning Brochure (May 2016), prepared by Andrew Martin - Planning. This considers local context, landscape and visual considerations, transport and accessibility, a strategic fit for Epping and presents illustrative proposals for each of the sites being promoted. Finally, our client supports the allocation of site SR-0132Ci in Policy P1. This will enable the redevelopment of the existing Epping Sports Club site for residential purposes and in turn, the development of new modern sports pitches and facilities for the Club on the opposite side of Bury Lane. This has clear planning and sporting benefits for the town as a whole. However, as the former will be used to fund or cross subsidise the latter, it will be necessary to agree

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a lower or no affordable housing contribution to ensure that the development of site SR-0132Ci remains viable.

Loughton (Draft Policy P 2)

No opinion

Please provide reasons for your view on Loughton:

Waltham Abbey (Draft Policy P 3)

No opinion

Please provide reasons for your view on Waltham Abbey:

Chipping Ongar (Draft Policy P 4)

No opinion

Please provide reasons for your view on Chipping Ongar:

Buckhurst Hill (Draft Policy P 5)

No opinion

Please provide reasons for your view on Buckhurst Hill:

North Weald Bassett (Draft Policy P 6)

No

Please provide reasons for your view on North Weald Bassett:

Our client objects to the disproportionately large number of new dwellings directed to North Weald Bassett, which is inconsistent with the settlement's role in the Local Plan's settlement hierarchy and the Draft Vision contained on page 30 of the Plan. Given the relative role of Epping and North Weald Bassett in the District's settlement hierarchy, the relative sustainability of the two settlements and the relative availability of and access to key services, facilities and public transport, it is clear that North Weald Bassett should be allocated

far less than the 1,580 new dwellings identified in the Plan and Epping far more than the 1,640 new dwellings it is allocated.

Chigwell (Draft Policy P 7)

No opinion

Please provide reasons for your view on North Weald Bassett:

Theydon Bois (Draft Policy P 8)

No opinion

Please provide reasons for your view on Theydon Bois:

Roydon (Draft Policy P 9)

No opinion

Please provide reasons for your view on Roydon:

Nazeing (Draft Policy P 10)

No opinion

Please provide reasons for your view on Nazeing:

Thornwood (Draft Policy P 11)

No opinion

Please provide reasons for your view on Thornwood:

Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sewardstonbury, Sheering, Stapleford Abbots (Draft Policy P 12)

No opinion

Please provide reasons for your view on Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sewardstonbury, Sheering, Stapleford Abbots:

http://eppingforest.consultationonline.co.uk/wp-content/uploads/sites/5/gravity_forms/3-fce9873862dde780a40e3cbe24771a88/2016/12/North-West-Epping-Brochure-12-16-Reduced.pdf

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7. Do you agree with the approach to infrastructure provision being proposed in the plan?

No opinion

Please explain your choice in Question 7:

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8. An Interim Sustainability Appraisal has been commissioned to support the Draft Local Plan. We would welcome any comments you may have on this.

In order to comply with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), it will be necessary to prepare a full Sustainability Appraisal and to make this publicly available for review alongside the next iteration of the Epping Forest Local Plan (i.e. the Pre-Submission Document). Any such Sustainability Appraisal should be made available prior to the commencement of the Local Plan consultation period.

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9. Do you wish to comment on any other policies in the Draft Local Plan?

Paragraph 2.15

Our client supports this paragraph on the basis that, notwithstanding the UK's impending exit from the European Union and any impact this may or may not have on international migration trends, there is an identified need for significant housing growth in the District brought about by internal migration - i.e. migration within the UK.

Figure 2.21

Figure 2.21 identifies that, on average, housing in the District is far less affordable than for England as a whole, with lower quartile earnings approximately 1/11th of lower quartile house prices (compared to approximately 1/6th nationally). This highlights the importance of delivering new affordable homes in the District, particularly in high value areas such as Epping (town), to provide affordable rent, shared ownership and if relevant starter homes, to address local housing needs. This would justify the inclusion of additional housing sites in Policy P1 and specifically to the north of Epping.

Paragraphs 3.81 to 3.82

These paragraphs refer to and repeat the generic Green Belt commentary contained in the National Planning Policy Framework. However, in the case of Epping Forest District, regard should be had to the purposes and objectives of the "Metropolitan Green Belt" in particular. The fundamental and original purpose of the Metropolitan Green Belt is to prevent Greater London merging into outlying settlements, including Epping. The failure to recognise this vital Metropolitan Green Belt function in the early sections of the Local Plan has led to a partly flawed growth strategy in subsequent sections, particularly where development is proposed to the south of Epping and to the northeast of Theydon Bois, thereby eroding an important and strategic Green Belt gap.

Paragraph 3.99

Our client supports the recognition in paragraph 3.99 that a key element of green infrastructure in the District is trees, including ancient forests, many woods and miles of ancient hedgerow. However, this statement is inconsistent with some of the allocations made in subsequent sections of the Local Plan, particularly to the south (site SR-0208) and east (site SR-0071) of Epping, on sites that include extensive wooded areas and where development is likely to lead to the loss of mature trees or at least compromise their long-term health.

Paragraph 5.12

This paragraph refers to the Green Belt surrounding Epping and identifies that a series of gaps that are important in maintaining separation with neighbouring Theydon Bois, Waltham Abbey, Upshire and North Weald. Despite this the Local Plan subsequently allocates housing growth to the south of Epping and to the northeast of Theydon Bois, thereby eroding an important and strategic Green Belt gap between the two settlements.

Paragraph 5.15

Local Plan paragraph 5.15 suggests that: (i) expansion to the south is the least harmful to the Green Belt and the surrounding landscape and would provide opportunities to promote residential development in close proximity to Epping Station; and, (ii) although expansion to the east is less favoured, this location provides opportunities for sustainable expansion of the settlement in close proximity to Epping Station and the town centre. However, these conclusions are not supported by EFDC's evidence base and there are sound planning reasons why development would be more suitable elsewhere. This is examined further in the consultation response to Policy P1 and to page 124.

Page 124 (Alternative Options - Residential Sites - Expansion to the North)

Our client objects to the reason given for rejecting growth to the north of Epping. According to page 124 of the Local Plan: This option would significantly harm the Green Belt, compromising the historic setting of Epping. The area to the north of the settlement is also the most sensitive in landscape terms. This justification is completely flawed and conflicts with EFDC's own evidence base. In particular: Firstly, the evidence base actually confirms that the allocated sites to the south of the town are likely to cause the greatest harm to the Green Belt. This is set out in Table 4.1 of EFDC's Green Belt Assessment: Stage 2, prepared by LUC in August 2016, which scores land to the south of Epping, i.e. sites SR-0069/33, SR-0113B and SR-0208, as "very high" for harm to the Green Belt. Whereas land to the north of Epping, i.e. sites SR-0132Ai and part of SR-0132Bi, which has not been allocated for development, only scores "high" for harm to the Green Belt. Furthermore, land to the south of the town also performs the vital and original purpose of the Metropolitan Green Belt - i.e. to maintain separation between Greater London and other outlying settlements. These sites, along with another proposed allocation to the north east of Theydon Bois, will erode the Green Belt gap between the two settlements. This is contrary to both Local Plan (2016) paragraph 5.12 which defines the gap as being "important" and the previous iteration of the Local Plan (2012) which identified a "Strategic Green Belt Gap" in this location. Secondly, the evidence base confirms that the allocated sites to the east of the town are the most sensitive in landscape terms. Figure 2.4 in the Settlement Edge Landscape Sensitivity Study, prepared by Chris Blandford Associates in 2010, identifies that land to the east of Epping, i.e. sites SR-0071 and SR-0153, has "high" landscape sensitivity. It is therefore more sensitive than land to the north, i.e. sites SR-0132Ai and SR-0132Bi, which has "moderate" landscape sensitivity. Thirdly, the evidence base directs that several of the allocated sites to the south and east of the town are less "suitable" for development than land to the north. Appendix B1.4.2 of the Report on Site Selection, prepared by Arup in September 2016, rates: - Site SR-0071, to the east, with 15 negative scores for site suitability; - Site SR-0069/33, to the south, with 14 negative scores for site suitability; - Site SR-0208, to the south, with 13 negative scores for site suitability; and yet - Site SR-0132Ai, to the north, has only 12 negative scores for site suitability. Even Site SR-0132Bi, also to the north, has 14 negative scores and performs better than Site SR-0071 and no worse than Site SR-0069/33. Fourthly, although allocations to the south and east of the town are in close proximity to Epping Station, they are a much further from Epping's only secondary school and a variety of community uses and facilities located in the northern part of the town. Development to the south and east is also likely to direct additional vehicle movements through the already heavily congested Station Road / High Street mini roundabout, which is the only realistic vehicular route to the town centre and onwards towards M11 J7. In summary, EFDC's decision to reject land to the north of Epping on Green Belt and landscape sensitivity grounds is inexplicable, unjustifiable and patently incorrect. Clearly it is the allocated land to the south and east of the town that is more harmful, more sensitive and less suitable, and accordingly land to the north of Epping should replace part or all of these draft allocations in the next iteration of the Local Plan document.

Report on Site Selection, Appendix B1.5.2

Our client objects to the findings in Appendix B1.5.2 of the Report on Site Selection (September 2016). This background report rules out expansion to the north of Epping on the basis that: "This option would significantly harm the Green Belt, compromising the historic setting of Epping, and is the most sensitive in landscape terms." Our client's detailed objections to this conclusion are set out in the consultation response to Page 124 (Alternative Options - Residential Sites - Expansion to the North).
