

Your ref: Local Plan Regulation 19 Representation  
Our ref: LON033 35003  
DD: 01245 505070  
E: [Lisa.skinner@bidwells.co.uk](mailto:Lisa.skinner@bidwells.co.uk)  
Date: 26/01/2018

Planning Policy Team  
Epping Forest District Council  
Civic Offices  
High Street  
Epping, Essex  
CM16 4BZ

Dear Sir or Madam,

**EPPING FOREST SUBMISSION VERSION LOCAL PLAN CONSULTATION, JANUARY 2018**

**REPRESENTATIONS ON BEHALF OF THE LONDON BOROUGH OF NEWHAM IN SUPPORT OF  
DEBDEN HOUSE CENTRE AND CAMPSITE, DEBDEN**

Please find enclosed representations to the above on behalf of the London Borough of Newham. The London Borough of Newham (LBN) is the sole owner of the Debden House Centre and Debden House Campsite as shown on the enclosed site plan.

The site is located on the northern edge of Loughton within Debden Green and is directly adjacent to the eastern boundary of the Epping Forest.

Debden House is a Grade II Listed Building with several poor quality and unsympathetic extensions and outbuildings which provide limited residential educational facilities, used privately by LBN staff for in-house training programmes, training for residents and to provide homework weekends for LBN residents. This facility is underused in its current form and use and, without a viable long term funding source to secure its ongoing maintenance, may be at risk of decay unless a viable use such as residential, consistent with its conservation, is found. Furthermore, as a previously developed site in the Green Belt, it may be afforded scope under National Planning Policy Framework (Framework) guidance for redevelopment proposals, subject to sensitive design and heritage and compliance with other policy considerations.

The Debden House Campsite is also the subject of these representations. We acknowledge the policies in the Submission Version Plan which seek to support and grow the tourist offer in the District, including the provision of a year-round visitor economy. Debden House Campsite is an existing facility situated in a prime location directly adjacent to the Epping Forest and is available to assist in the growth of the District's tourist offer, in accordance with the Submission Version Local Plan's objectives.

The two components of the site, the Centre and the Campsite, are accessed both via a vehicle access point off Debden Green to the south. However, as the functions of the two components of the site are spatially and commercially very distinct from one another, in planning terms they should be considered as separate and distinct elements.

Taking account of the above, our responses to the policies of relevance to each of the site's components are considered below.

Victoria House, Victoria Road, Chelmsford CM1 1JR  
T: 01245 250998 E: [info@bidwells.co.uk](mailto:info@bidwells.co.uk) W: [bidwells.co.uk](http://bidwells.co.uk)

## Debden House Centre

The Debden House Centre comprises the Grade II Listed Debden House with several poor quality and unsympathetic extensions and outbuildings which provide limited educational and leisure activities for meetings, conferences, exhibitions and education. It has the capacity to provide for up to 60 residential bedspaces. The House was initially set up by LBN solely for use by its own residents and staff and not for the general public, but is currently underused.

Together with its grounds the House occupies approximately 1.4 hectares (3.5 acres).

### Framework Guidance

#### Conserving the historic environment

Paragraph 126 of the Framework encourages local planning authorities to recognise that heritage assets are an irreplaceable resource and that they should be conserved in a manner appropriate to their significance. In particular, the Framework advises local planning authorities to:

- Put such assets to viable uses consistent with their conservation;
- Take into account the desirability of new development making a positive contribution to local character and distinctiveness;
- Take into account opportunities to draw on the contribution made by the historic environment to the character or place; and
- Take into account the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring.

Paragraph 137 says that local planning authorities should look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

#### The need for housing

The Framework seeks to boost significantly the supply of housing across the country. Paragraph 47 says that to boost significantly the supply of housing, local planning authorities should:

- Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for housing;
- Identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.

The Council is proposing to release Green Belt land in order to facilitate the provision of new housing as part of the Submission Version Local Plan. This demonstrates that there is currently an insufficient supply of land to meet the five year housing land supply requirement (+5% or 20%). The Council should therefore consider all sources of potential housing land supply as means of meeting its requirements, including the potential for sympathetic residential conversion of heritage assets such as Debden House.

#### Previously developed land in the Green Belt

Notwithstanding heritage constraints, as a previously developed site, Debden House itself would qualify to be considered as an exception to inappropriate development in the Green Belt, as specified by Framework paragraph 89, which permits inter alia:

- The extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; and
- Limited infilling or the partial or complete redevelopment of previously developed sites, whether redundant or in continuing use, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

Taking account of the above, Framework guidance facilitates the redevelopment of brownfield sites in the Green Belt and the viable reuse of heritage assets such as Debden House. Redevelopment of the site offers the potential to better reveal the building's significance, in accordance with Framework policy.

#### **Responses to the Relevant Policies**

##### Policy DM7 – Heritage Assets

We note that this policy broadly reflects the policy guidance contained within the Framework. As a Grade II Listed Building, we recognise that any proposals for the residential redevelopment of Debden House would need to be considered under this policy.

Furthermore, the potential replacement of any unsympathetic extensions to the building with a sensitively planned redevelopment of the House site could present an opportunity to better reveal the building's significance, in accordance with Framework paragraph 137. Any redevelopment proposals would be accompanied by Heritage Statement to assess the building's significance to ensure that any new buildings within the site or additions to Debden House would be sympathetically designed and would not cause harm to its heritage value, in accordance with the policy.

#### **Debden House Campsite**

The Campsite is over 20 hectares (50 acres) and extends to the north and north-west of Debden House. It was originally opened in 1947 and has 375 pitches available for hire, 60 of which have electric hook-up. This area caters for caravans and camping and is open to the general public on a seasonal basis (from 29<sup>th</sup> April to 31<sup>st</sup> August, with weekend only opening (Friday to Sunday) until 1<sup>st</sup> June). The western edge of the campsite forms the boundary of the Epping Forest. There is no physical boundary between the Forest and the campsite, meaning visitors to the campsite have the freedom to enter and explore the Forest as they wish.

#### **The Evidence Base**

Of the full suite of evidence prepared to support the Submission Version Plan, we draw particular attention to the Epping Forest Visitor Accommodation Needs Assessment – Phase 1 Report (Hotel Solutions, August 2016), which identifies:

- A limited supply of visitor accommodation in the District, but that there is market potential for the development of a wide range of visitor accommodation sites;
- Two key locations of opportunity for accommodation development in the District based upon its local characteristics; one being the Lea Valley Regional Park and the other being the area around the Epping Forest as areas for outdoor sport and recreation.

Allied to the above, accommodation could play a role in developing the Forest as a destination for outdoor recreation and generating an income stream to support Forest management. There could be opportunities

for accommodation development in the buffer lands and other lands immediately adjacent to the Forest, including touring caravan and camping sites, camping pods, tree camping and glamping;

The evidence base provides distinct opportunities for sensitively planned visitor accommodation within the fringe of the Epping Forest, such as enhanced facilities at the Debden House Campsite, provided the Council's Green Belt policies acknowledge such forms of accommodation as appropriate in the Green Belt.

### Responses to the Relevant Policies

#### Policy SP2 – Spatial Development Strategy

We **support** the Policy's acknowledgement under part F iv) that growth in the tourism industry and visitor economy should be supported. The general approach underpinning Policy SP2 is supported by the evidence. We therefore agree with this policy insofar as it provides in-principle support for sustainable rural tourism that benefits businesses in rural areas, in accordance with Framework paragraph 28.

#### Policy SP6 – Green Belt and District Open Land

We **object** to the policy because it contains insufficient guidance on how the Council may consider development proposals which are triggered by Framework Paragraph 89 (exceptions to inappropriate development), but which accord with other strategic policies within the Plan including Policy SP2.

This is because 92% of the District is currently designated as being within the Metropolitan Green Belt and that the locational and landscape setting needed to make such tourist accommodation attractive to visitors means that it would be highly likely that new or enhanced development proposals would be required to be considered under Framework paragraph 89. Framework paragraph 89 says that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this include provision of "*appropriate* facilities for outdoor sport and outdoor recreation", as long as they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. The Submission Version Plan makes no reference to whether development proposals which would trigger consideration under Framework Paragraph 89 could be considered "*appropriate*" by definition.

Despite support from other proposed Strategic Policies, the omission of this guidance within Policy SP5 means that the Submission Version Plan offers no benchmark to prospective applicants or to EFDC decision makers by which to determine whether such proposals in Green Belt locations would be acceptable in principle. In light of local circumstances and the evidence, the policy should be expanded to provide an indication of the Council's interpretation on appropriate facilities for outdoor recreation proposed under Framework paragraph 89 in relation to tourism in particular camping.

#### Policy SP7 – The Natural Environment, Landscape Character and Green and Blue Infrastructure

We **support** this policy's aspiration to protect the natural environment in order to enhance its quality and access to it. The District's natural environment, in particular the environments which facilitate outdoor sport and recreation in the rural and protected areas, are identified as being a significant draw for tourists. We therefore consider that for this policy to be fully effective, aspirations to protect and enhance the natural environment should be planned for alongside proposals which facilitate enhanced provision, maintenance of and access to it.

#### Policy E4 – The Visitor Economy

We **support** the thrust of this policy because it broadly reflects the need for development of high quality visitor accommodation under part i), the retention and improvement of existing visitor accommodation under part iii) and support for a year-round visitor economy under part v). As a whole, this policy is a necessary introduction to the Submission Version Local Plan because the adopted Local Plan is silent on the matter.

In particular respect of part v) we support the Policy's approach to year-round provision because this would provide existing providers of accommodation, such as Debden House Campsite, with the flexibility to diversify and enhance their business operations in order to remain viable and attractive in a changing visitor accommodation market.

In light of the above we consider that Debden House Campsite should be recognised in the policy (or its supporting text) as a prime location for potential enhanced tourist accommodation because it is an existing facility and due to its location directly adjacent to the Forest.

### **Other policy matters**

The commentary provided above demonstrates that the functions of the two components of the site, the Centre and the Campsite, are clearly very different from one another, both spatially and commercially. This means that any potential future proposals for the residential conversion of Debden House, a previously developed site in the Green Belt which is also of heritage value, cause it to be very different from any development for tourist accommodation that could be delivered on the Campsite.

Any potential future redevelopment of Debden House should therefore be considered as separate and distinct elements.

### **Summary**

In respect of Debden House we note that the Framework and Submission Version Plan policy DM7 facilitate the residential redevelopment of this underused heritage asset which is also a brownfield site in the Green Belt. In the context of the District-wide shortfall in housing land supply, the residential redevelopment of the site in a manner which is sympathetic to its significance and which does not have a greater impact upon the openness of the Green Belt than the existing development should be considered acceptable in principle. Therefore:

- In respect of Policy DM7 – Heritage Assets – we note the policy.

In respect of the Campsite, we generally support the policies because they propose to support the tourist offer in the District, in accordance with the evidence base. However, due to the rural nature of much visitor accommodation identified in the evidence and that the overwhelming majority of land within the District is classified as Green Belt, the Draft Plan needs to provide more clarity on whether such development proposals which would trigger consideration under Framework paragraph 89 as exceptions to inappropriate development in the Green Belt could be considered as “appropriate facilities for outdoor sport and recreation” by definition.

Taking account of the significant Green Belt constraints on land availability and suitability, Debden House Campsite should be seen as a prime location for enhanced tourist accommodation because it is an existing camping facility, located directly adjacent to the Epping Forest and its physical attributes make it a desirable opportunity for such accommodation, as identified by the evidence.

Taking account of the above our responses to the policies of relevance to the Campsite are therefore as follows:

- Policy SP2 – Spatial Development Strategy – **Support**;
- Policy SP6 – Green Belt and District Open Land – **Object**;
- Policy SP7 – The Natural Environment – **Support**;
- Policy E4 – The Visitor Economy – **Support**;

Yours faithfully

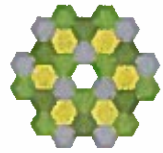


**Lisa Skinner**  
Partner

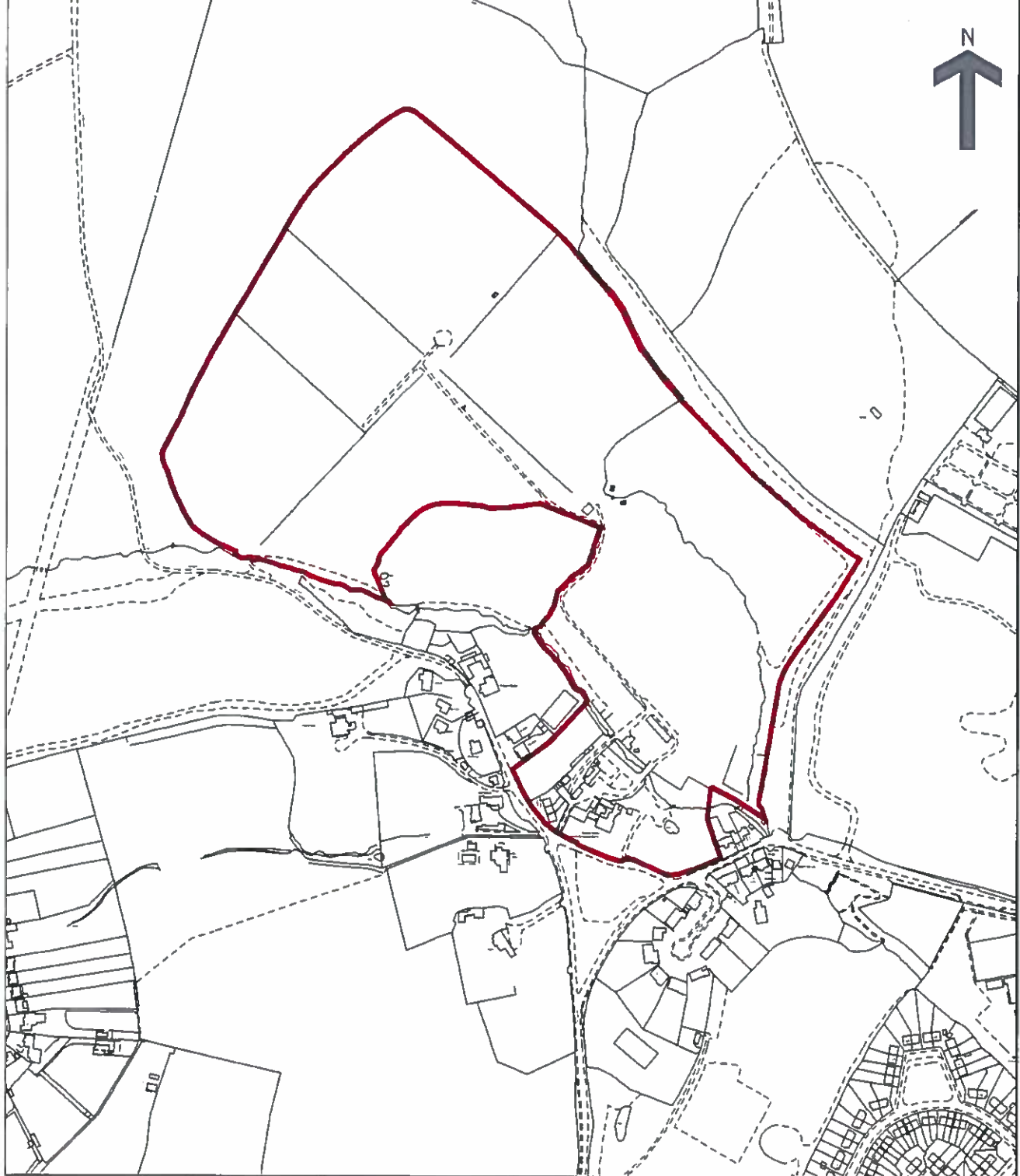
**Enc. Site Plan**

Land Registry  
Official copy of  
title plan

Title number **EX748396**  
Ordnance Survey map reference **TQ4398NE**  
Scale **1:5000 reduced from 1:2500**  
Administrative area **Essex : Epping Forest**



©Crown Copyright. Produced by Land Registry. Reproduction in whole or in part is prohibited without the prior written permission of Ordnance Survey. Licence Number 100026316.



**This official copy is incomplete without the preceding notes page.**