



tel:
fax:
email:
web:

The Planning Policy Team
Directorate of Neighbourhoods
Epping Forest District Council
Civic Offices
323 High Street
Epping
CM16 4BZ

12 December 2016

MD – 13/648
BY EMAIL

Dear Planning Policy Team,

EPPING FOREST DISTRICT COUNCIL DRAFT LOCAL PLAN

I refer to the publication of the Epping Forest District Council (EFDC) draft Local Plan for public consultation on 31 October 2016, and hereby submit representations on behalf of our client, Anderson Design & Build Limited.

The policies of the draft plan to which these representations primarily relate are:

- Policy SP 2: Spatial Development Strategy 2011-2033
- Policy SP 3: Strategic Allocations Around Harlow
- Policy SP 5: Green Belt & District Open Land
- Policy E 1: Employment Sites

Background

In October 2014, an application for planning permission was submitted to EFDC for the proposed development of land at Harlow Gateway South (HGS) (reference EPF/2517/14) for commercial purposes. The site is currently located within the Metropolitan Green Belt.

At the District Development Management Committee on 5 August 2015, members resolved to refuse planning permission for the proposed development and two reasons for refusal were given. The first reason cited the impact of the proposal on the Green Belt.

An appeal against the Council's decision to refuse the application was made to the Secretary of State in January 2016 and a local public inquiry was held for 4 days in October 2016. Despite the site having been identified in the draft Local Plan as a potential strategic site (site allocation N), the Inspector dismissed the appeal, although concluded, amongst other things:

"It is locationally sustainable in that a good bus service passes the site and stops are within acceptable walking distance. Good access to Harlow's cycle network would be provided by an element of the proposal itself.

It has previously been used as a temporary basis as a highway compound. In 2002 it was considered by the Council itself as a potential site for a waste contractor's depot and scaffolding yard. More recently, in 2016 it was nominated as a development site in the now withdrawn Essex Waste local plan. As Mr Courtney acknowledged in cross-examination, the site would be a good candidate for the kind of development now proposed, were it not within the Green Belt as defined. All these arguments are in favour of its potential selection."

The conclusions reached by the Inspector clearly support the allocation of the site for commercial development.

Meeting the Sustainable Development Needs of the District / Benefits of Allocating Site N for Employment Development

Draft Policy SP 2: Spatial Development Strategy 2011-2033 states that the Council will provide approximately 11,400 new homes and 10,000 new jobs through the Local Plan up to 2033. The biggest obstacle to achieving this growth is the current designation of over 92% of the district as Green Belt. This is acknowledged at paragraph 3.85 of the text supporting Policy SP2, which states: *"The evidence suggests that there is a need for the Council to review the extent of the Green Belt in the district if it is going to meet the long term development needs."* This recognition is supported. Unless a significant number of sites are released from the Green Belt as part of the Local Plan, the opportunity to provide enough homes and jobs to meet the projected needs of the district over the plan period will be lost.

In considering the development potential of the site, the Council's attention is drawn to the Government's planning policies for England set out in the National Planning Policy Framework (NPPF).

Paragraph 17 states that the planning system should, inter alia:

"Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. 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."

Paragraph 18 of the NPPF states:

"The Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future."

The proposed development of HGS for commercial purposes accords with these principle objectives for sustainable economic growth.

At a local and regional level, it is noted that there is currently no economic development strategy for Epping Forest. An Economic Plan for Essex (April 2014) does however exist and this sets out an ambitious target of 117,745 new jobs by 2021. The evidence submitted in support of the planning appeal identified that on average the current rate of job creation across Essex is falling well short of the targets.

The Economic and Employment Evidence to Support the Local Plan and Economic Strategy prepared by Hardisty Jones on behalf of EFDC in September 2015 identifies that over 400 extra jobs will be needed each year over the plan period up to 2033. The report also notes that the construction sector will in Epping Forest will be strong and this will be the fastest growing employment sector in the District. This reflects the locational advantages of the area for construction based firms given the good access to London and the south east.

However, the separate report prepared by Hardisty Jones on behalf of EFDC titled Economic Evidence to Support the Development of the OAHN for West Essex and East Herts (September 2015) indicates that job creation and the economic performance of Epping Forest and Harlow is poor.

Figure 3.7 of the draft plan illustrates the Council's preferred strategy for housing and employment growth in the district. This includes focusing employment development in and around Harlow. While employment growth is to be concentrated in and around the Harlow Enterprise Zone, the acknowledgement in the draft plan that additional sites in other sustainable locations will also need to be identified in order to meet the development needs of all types of business (i.e. not just those related to the high value sectors that is the focus of the Enterprise Zone) is supported. This is particularly important given that Figure 2.17 of the draft plan (at Para 2.33) highlights that the construction sector is particularly strong in the district and much higher than the east of England and national average.

The HGS site forms part of Site Allocation N, located on the A414 immediately to the north of Junction 7 of the M11, which is proposed to be allocated for employment purposes. The proposed allocation is fully supported and it will contribute to EFDC's 10,000 job target identified in the Plan. The site is in a suitable and sustainable location for employment development. Furthermore, the Inspector at the recent inquiry accepted that it is a strong candidate for employment development.

Summary

The allocation of Site N for employment development would, in the first instance, enable the Council to contribute towards meeting the economic and employment objectives of its draft Local Plan. The Council is therefore respectfully requested to give significant weight to the economic, social and environmental benefits that the allocation of Site N would bring about over the plan period through the creation of much needed jobs. The benefits of this allocation would significantly outweigh any perceived harm to the Green Belt in this location.

Yours sincerely,

A black rectangular redaction box covering the signature of Matthew Druce.

Matthew Druce
Associate, Planning