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

29th January 2018

OUR REF. 18/029
BY EMAIL

Dear Sir/ Madam,

**EPHING FOREST DISTRICT COUNCIL LOCAL PLAN SUBMISSION VERSION CONSULTATION
| ST MARGARETS COMMUNITY HOSPITAL, EPPING**

We write to you on behalf of our client, NHS Property Services Ltd, in relation to Epping Forest District Council's Local Plan Submission Version Consultation which is being undertaken until 29th January 2018. Our client wishes to outline the development potential of the site at St Margaret's Community Hospital, Epping for inclusion within the Local Plan. Enclosed with these representations is a Site Location Plan.

a. NHS Property Services Site Ownership

In April 2013, the Primary Care Trust and Strategic Health Authority estate transferred to NHSPS, Community Health Partnerships and NHS community health and hospital trusts. All organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services, improve the quality of care and ensure that the estate is managed sustainably and effectively.

NHSPS's Property Strategy team has been supporting Clinical Commissioning Groups and Sustainability and Transformation Plan groups to look at ways of better using the local health and public estate. This will include identifying opportunities to reconfigure the estate to better meet commissioning needs, as well as opportunities for delivering new homes (and other appropriate land uses) on surplus sites emerging from this process.

By way of background, local health commissioners are currently developing a strategy for the future delivery of health services in this area. This will involve the release of certain NHSPS landholdings which are no longer required for the delivery of health services.

NHSPS is therefore promoting the site in accordance with Department of Health guidance (Health Building Note 00-08) which states "NHS PS owned sites that may become surplus to requirements should be protected by securing specific land-use policies for these sites in the relevant DPDs".

Should any part of the subject site be declared as surplus to the operational healthcare requirements of the NHS in the future (decision expected within 5 years), then the site should be considered suitable and available for alternative use, and considered deliverable within the period 5- 10 years.

b. Site Context

The site is part of the St Margaret's Community Hospital which is located just east of the settlement of Epping. The majority of the hospital site is not located within the Green Belt; however land surrounding the entrance road to the site is designated as Green Belt land, and is currently not proposed for removal within the emerging Local Plan.

These representations prepared for the consultation seek to promote the removal of this small area of land from the Green Belt as it is not considered to contribute towards the Green Belt's purposes. The removal of this area of land from the Green Belt will help to facilitate the comprehensive redevelopment of the site should it become surplus to the NHS's requirements in the near future.

c. National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) is the preeminent national policy; in law, regard must therefore be had to it. In summary, the following paragraphs of the NPPF are of particular relevance to the Local Plan making process, and should be complied with:

- a) Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. They should be consistent with the principles and policies set out in the NPPF, including the presumption in favour of sustainable development (Paragraphs 150-151).
- b) Proposed housing supply must meet evidential need for housing of all types, including a 5% buffer for five year housing targets (or 20% in cases of persistent under delivery), these targets must be deliverable. The Council must identify a supply for years 6-15 which is specific and developable (Paragraph 47).
- c) Local Plans should be aspirational but realistic. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan (Paragraph 154).
- d) Local Plans should be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.
- e) There is a cross-boundary duty to co-operate, particularly with planning issues which relate to the strategic priorities. LPA's should work collaboratively with other bodies to ensure strategic priorities across local boundaries are properly co-ordinated and clearly reflected in Local Plans (Paragraph 178-179).
- f) The Inspector's primary task will be to consider the soundness of the submitted plan, this will be assessed against the following soundness criteria:
 - **Positively prepared** – the plan should be prepared 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;
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

The Housing White Paper (February 2017) urges local authorities to make more land available for homes in the right places by maximising the contribution from brownfield land, releasing more small and medium sized sites.

d. Overview of Epping Forest District Council's Submission Version Consultation Document

Housing Requirements

The document prepared for the consultation identifies that there is a need for around 11,400 homes in the district over the emerging plan period of 2011 to 2033. This equates to a provision of, on average 518 dwellings per annum.

As identified in the draft Local Plan, the Government's Standardised Housing Methodology, which was published for consultation in September 2017, identifies an annual requirement in the district of 923 dwellings. This annual requirement would result in the plan needing to provide around 20,300 dwellings over the plan period, a significant increase from the current 11,400.

Loss of Community Uses

The emerging Plan states at draft Policy D4, that in order to retain sites for community uses, the council will require robust evidence from applicants seeking to demonstrate that there is no longer a reasonable prospect of the site's continued use.

To confirm, a property can only be released for disposal or alternative use by NHSPS once Commissioners have confirmed that it is no longer required for the delivery of NHS services. Furthermore, NHSPS estate code requires that any property to be disposed of is first listed on "e-PIMS", the central database of Government Central Civil Estate properties and land, which allows other public sector bodies to consider their use for it.

The ability of the NHS to continually review the healthcare estate, optimise the use of land, and deliver health services from modern and fit for purpose facilities is crucial. Given that there is very careful oversight from NHS England and CCGs to ensure sufficient services are provided, and that the estate is fit-for-purpose, additional protection through planning policy should be unnecessary in relation to public healthcare facilities.

Therefore, should any part of the site be declared as surplus to the operational healthcare requirements of the NHS by health commissioners, this should be considered sufficient to satisfy draft Policy D4 and any subsequent replacement policy.

e. Spatial Development Strategy

The Council's Spatial Development Strategy, outlined at draft Policy SP 2, identifies an 8 part approach to ensure Epping Forest District is able to provide a minimum of 11,400 dwellings during the plan period. This includes:

1. Development of Garden Communities;
2. Proposing development in Flood Zones 2 and 3 where need cannot be met in Zone 1;
3. Redeveloping previously developed land;
4. Redeveloping open space in locations with adequate provision;
5. Redevelopment previously developed Green Belt land;
6. Redeveloping Green Belt, edge of settlement sites;
7. Redeveloping low quality agricultural land; and
8. Enabling small scale rural sites to come forward.

The eight development approaches provide a range of means to provide the housing figure whilst being mindful of the District's constraints.

In relation to Epping, the same draft policy identifies that the Epping settlement will take in excess of 1,300 dwellings over the plan period. This is significant, as it identifies that Epping is a settlement

which has sufficient services and infrastructure to be considered for significant expansion over the coming years. It is also important to note in relation to the land at St Margaret's Community Hospital, that part C of the same draft policy states that development proposals within the defined settlement boundaries will be permitted providing they comply with other parts of the development plan.

It would therefore be highly beneficial for the Council to realign the Green Belt in this location so as to ensure this policy compliant site can come forward should it be deemed to be surplus to the requirements of the NHS in the short term.

f. Site Suitability

The site is almost entirely located within the settlement confines of Epping. Only a small area of land surrounding the entrance road into the site is located within the Green Belt. In addition, the development of sites such as this would reduce the pressure for the release of Green Belt land and greenfield sites elsewhere in the borough. It should therefore be considered that the site is suitable for redevelopment for intensification purposes and the small amount of land located at the entrance can be removed from the Green Belt.

It is considered that this small area of land is not performing against the Green Belt's purposes as identified in the NPPF.

Land at St Margaret's Cottage Hospital, Epping
<i>1. to check the unrestricted sprawl of large built-up areas</i>
- The area of the site which is located within the Green Belt does not perform this function as it is surrounded by existing built form on three sides.
<i>2. to prevent neighbouring towns merging into one another</i>
- The area of the site located within the Green Belt does not separate neighbouring towns.
<i>3. to assist in safeguarding the countryside from encroachment</i>
- The part of the site which is located within the Green Belt does not perform this function as it is bound on three sides by existing built form.
<i>4. to preserve the setting and special character of historic towns</i>
- The part of the site which is located within the Green Belt is not within a historic town, nor does it preserve the setting of a historic town.
<i>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land</i>
- The area of land located within the Green Belt measures around 0.7ha in size and is bounded on three sides by existing built form. The release of the site from the Green Belt would therefore not impact greatly on brownfield regeneration in the district.

The realignment of the Green Belt in this location where the Green Belt is of a low quality will help to ensure that the Green Belt remains intact in locations where it is performing a more important purpose, predominantly in locations where it is without built form.

g. Sustainability

Given that the site is almost entirely located within the settlement confines of Epping, the redevelopment of the site, should it become surplus to the requirements of the NHS, is considered to be sustainable.

The golden thread running through the NPPF is a presumption in favour of sustainable development. This means that developments which accord with the Local Plan should be approved without delay. The three pillars of sustainability within the NPPF are identified as Social, Environmental, and Economic; the definitions of these terms and the ways the proposals at Epsom Cottage Hospital confirm with these pillars are identified below.

Social

The NPPF defines socially sustainable development as those which contribute toward supporting a strong, vibrant and healthy community by providing the supply of housing required to meet the needs of present and future generations, through a high quality built environment with accessible services and support of health, social and cultural wellbeing.

The redevelopment of St Margaret's Cottage Hospital accords with the social pillar of sustainable development through the provision of an increased number of residential dwellings on a sustainably located site in order to help meet the Council's identified and growing need for housing. Given the Council's growing housing requirement since the introduction of the DCLG's Standardised Housing Methodology, it is ever more important that the Council seek to exceed their existing targets.

Should the Council consistently fail to meet their identified housing target, there could be serious social instability caused including overcrowding of existing housing stock and undersupply of housing. In addition to this, the site could represent the opportunity for the delivery of affordable housing towards the Council's identified need, representing a further opportunity to deliver a socially sustainable development.

Environmental

The NPPF defines environmentally sustainable development as development which contributes to protecting and enhancing the natural, built and historic environment through improving biodiversity, using natural resources prudently, and minimising waste and pollution.

A scheme at St Margaret's Cottage Hospital would provide sustainably located residential dwellings within the existing settlement boundary of the settlement of Epping. This reduces the pressure on Green Belt and greenfield sites, with the inherent environmental benefits, and the need for any future residents of the site to travel long distances by unsustainable transport methods, subsequently reducing pollution and use of non-renewable energy sources.

Economic

The NPPF defines economically sustainable development as development which contributes toward building a strong, responsive, and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation.

The proposals at St Margaret's Cottage Hospital will accord with the economic pillar through the introduction of an increased number of residents into an existing urban area. These new residents will help to secure the economic viability and vitality of the existing local business and services through an increased customer base.

They will also ensure that a higher provision of land is available for a land use which is identified as being highly demanded at this point in time ensuring that a sufficient supply of land is available in a sustainably located site.

h. Summary and Conclusions

Should any part of the St Margaret's Community Hospital site be declared as surplus to the operational healthcare requirements of the NHS in the future, then the site would be considered suitable and available for alternative use, and considered deliverable within the period 5 – 10 years.

These representations confirm that the site is almost entirely located outside of the Green Belt other than a small area of land surrounding the entrance road into the site. They also identify that the majority of the site is located within the settlement confines of Epping.

The subject site is considered available, suitable and deliverable within the 5-10 year period of the plan.

I trust that these representations provide the Planning Authority with sufficient information to consider the site for residential development within the forthcoming Local Plan.

We would request to be kept informed of future stages of the Local Plan preparation. If you require any further information, please contact the undersigned (email: imcgeeve@iceniprojects.com Tel: 020 3657 5036) or my colleague Ian Mayhead (email: imayhead@iceniprojects.com Tel: 0203 435 4204).

Yours sincerely,



Isobel McGeeve
Assistant Planner

Encl. Site location plan