



# Phase 2

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## **Epping Forest District Draft Local Plan 2018 Submission Version Response on Behalf of Mr I Bennett Mill House Farm Theydon Road, Epping**

**January 2018**

These representations to the Submission Draft Local Plan are submitted on behalf of our client, Mr Ian Bennett, who own land at Mill House Farm, at Bell Common just south of Epping. The site is shown on the plan attached as [appendix 1](#) to this response.

Our previous representations to the regulation 18 draft of the Local Plan outlined our proposal for the residential allocation of the site specifically for over 55s accommodation. The details of the site and its justification remain unchanged, and are attached as [appendix 2](#) for ease of reference, and to avoid duplication.

### **Policy SP 2 Spatial Development Strategy 2011-2033**

This policy sets out a strategy which does not rely on the scale or sustainability of settlement types, but instead a reliance on a sequence of locations dictated by flood risk, open spaces, brownfield land, Green Belt etc. As set out above, there has been a number of changes in the distribution and location of allocated sites since the Reg 18 consultation, but it is not clear from the evidence base how the changes have been justified, given that the sequential approach factors are relatively fixed and have not changed between consultations.

In particular, when Phase 2 Planning questioned officers during the current consultation, they pointed to a 'frequently asked question' on their consultation website which states:

***"I cannot find details in the evidence base as to why individual sites have been discounted by the Council. When will the remaining appendices to the Site Selection Report be made available?"***

*The Site Selection Report has been published by the Council as part of the Regulation 19 Publication of the Local Plan Submission Version. However, the Council is yet to publish all of the detailed appendices which accompany the Site Selection Report and provide details relating to the assessment of individual sites. This does not mean that this assessment work has not been completed, but rather the delay in the publication of the appendices is due to the time it takes to generate the pro forma for each site, including the mapping for*

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*each site, all of which must be checked for accuracy before publication. These appendices will be published by the Council prior to the Submission of the Local Plan for Independent Examination.*

*The Council considers that the suite of evidence base documents available is adequate and sufficient to enable those wishing to make representations on the Local Plan Submission Version to do so. The information currently available concerning the sites allocated in the Local Plan Submission Version is sufficient to allow any disappointed party promoting non-allocated sites to make representations as to the comparative merits of allocating the promoted site. However, for the avoidance of doubt, the Council will bring the publication of the remaining appendices to the attention of the Planning Inspector appointed to examine the Plan to ensure that the issue can be considered appropriately through the Independent Examination process.”*

In our view, it is impossible to make any sense of the changes to the Plan and the justification for the introduction of new sites and deletion of those previously proposed, without sight of this key part of the Council’s evidence base. In our view, it is testimony to the Submission draft being rushed to avoid any increase in housing numbers as a result of the Government’s consultation on standard method for calculating local authorities’ housing need (*Planning for the Right Homes in the Right Places: Consultation Proposals Sept 2017*), which suggested an increased annual requirement from 514 to 923 dwellings based on the standard methodology. This was proposed to be brought in by 31<sup>st</sup> March for those authorities that were not advanced with their Local Plans.

As evidence of this, at the Special Council meeting of 14<sup>th</sup> December 2017, Members were advised by legal Counsel that due to this, the Council must not generate a need for further consultation with the Plan, and that no additions or deletion of sites could take place without such a need being generated ([https://eppingforestdc.public-i.tv/core/portal/webcast\\_interactive/323384](https://eppingforestdc.public-i.tv/core/portal/webcast_interactive/323384)).

Notwithstanding this, we have concerns over the order of the factors within the sequential approach, in particular the identification of previously developed land in the Green Belt below the use of urban open spaces, and the inclusion of greenfield Green Belt land only one below brownfield GB land, and again below urban open spaces. This has generated considerable objection within those settlements affected by the loss of valued open spaces, which are clearly more sensitive than the loss of brownfield sites within the Green Belt.

As a consequence, we consider that the Plan is not sound and object to Policy SP2 on this basis.

### Policy P1: Epping

Under this section, the Council makes reference to Epping as one of the most sustainable settlements in the district, and proposes a number of allocations, including the largest at EPP.R1 and R2, located just to the east of our clients site at Bell Common. These utilise greenfield Green Belt land, whereas our clients land comprises residential garden and thus brownfield land, within a cluster of existing development, well



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screened from wider viewpoints, and serve less of a Green Belt function than the land utilised in the proposed allocations, which breach the well-defined southern boundary of Epping marked by Bridge Hill and Brook Road.

In addition, our clients land would meet an identified and growing need, when the Submission draft only mentions housing for elderly people once as one objective (B(ii)), without following up with detailed policies within the Development Management section.

The site comprises use of a site that most people do not even know exists – it is well hidden. As such it creates a perfect site for a small collection of 7 houses all dedicated to the older and retired person. The Council has a need to find a way of delivering elderly people with no local family to avoid being kept in hospital awaiting Social Care. Our client's site is perfect for this and is adjacent to Wensley House which has 24 x 7 medical attention available and welcomes our clients' submission.

We consider that as a result of the flawed development strategy, and the lack of any strategy to deal with homes for the elderly, then Policy P1 is not sound as a consequence.

The Plan should be amended by re-ordering the sequential site selection; review and allocate previously developed land on the edge of larger settlements ahead of greenfield sites; and should allocate our clients land as a consequence to meet housing needs for the over 55s.

We trust the above comments will be taken in to account as the draft Local Plan is progressed, and would welcome attending and contributing to the Examination.