

Briefing Note:

Site SR-0153 – Land North of Stewards Green Road, East Epping

December 2017



Pigeon Investment Management Ltd ('Pigeon') are representing Land North of Stewards Green Road, East Epping (site reference SR-0153), which was selected as the largest single draft allocation for Epping for 305 homes in the 'Regulation 18' draft local plan published for consultation in Autumn 2016. The site was then selected as one of 7 Strategic Masterplan locations in Epping District as set out in the May 2017 report that forms part of the Local Plan Evidence base and was endorsed by Members in their Cabinet meeting of 15 June 2017.

The Strategic Masterplan report (figure 1) identifies that an Epping Masterplan would comprise either a single Masterplan incorporating SR-0153 or a pair of linked Masterplans between the sites making up Epping South and SR-0153, to provide a total of 930 new homes based on the draft allocations. From engagement with Officers including participation in the Developer's Forum, it was understood this process would begin in earnest in November 2017.

Pigeon looked forward to working with Officers, Members and other stakeholders in bringing forward their Masterplan vision for Epping.

However, the publication on 05 December of the Submission Version Local Plan within the papers for the 14 December Council meeting brought a significant change in position for site SR-0153 with the site removed from the draft allocations for Epping within that document, with the Strategic Masterplan defining an allocation of 950 homes South of Epping. We are concerned as to how the status of the land that we are promoting can change so quickly from being defined as 1 of 7 Strategic Masterplan sites, as endorsed by Epping Forest District Council (EFDC) to being removed from the Local Plan entirely, with no apparent change in the evidence base to support this approach.

Pigeon were surprised that the revised approach to delivering housing in Epping was put forward, with a significantly greater proportion of housing directed to the less sustainable location to the South as this does not meet the tests of soundness required through the Examination in Public (EiP) as an evidence based approach. These arguments are detailed further within this briefing.

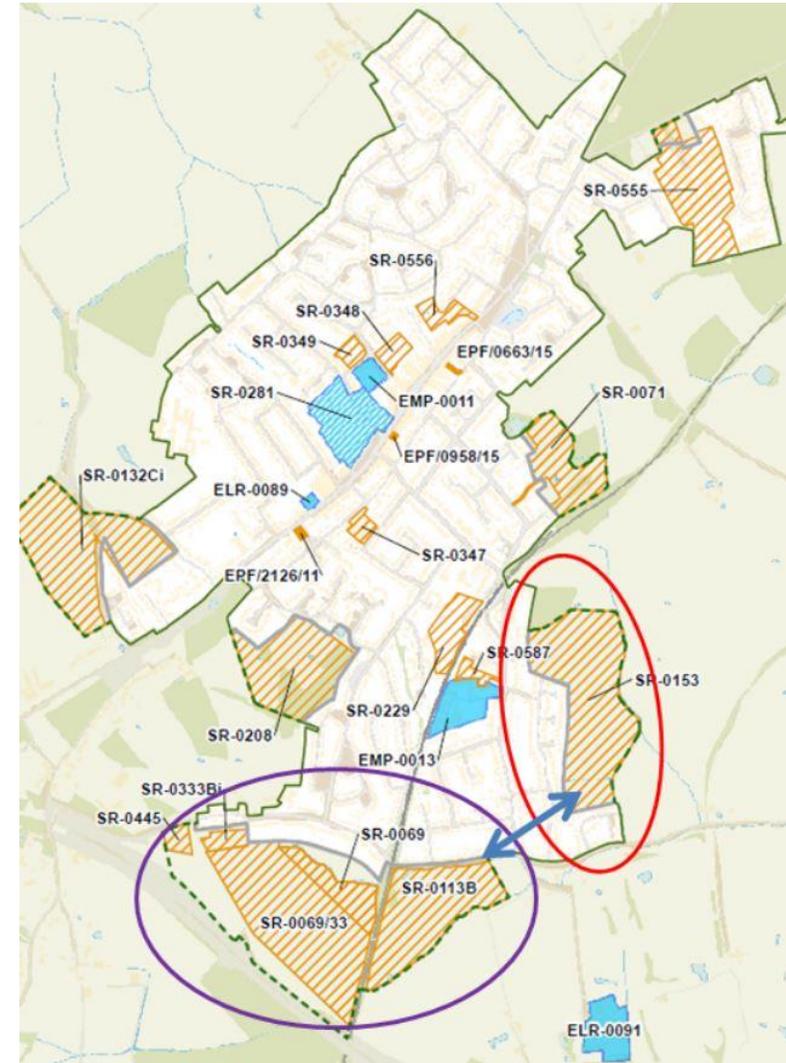


Figure 1. Strategic Masterplan Report – EFDC, May 2017

Tests of Soundness:

The National Planning Policy Framework (NPPF) requires that a Local Plan meets a test of soundness, namely that it is positively prepared, justified, effective, and consistent with National Planning Policy. As detailed further within this briefing, Pigeon do not consider that the proposals for the town of Epping can be considered to be 'sound' as they are not **Justified**. The NPPF requires that for a plan to be **Justified**, it should *be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence*. Pigeon would contend that the allocation of the majority of growth to the South of Epping cannot be considered to be the most appropriate strategy, when considered against the reasonable alternative of allocating a level of this growth to East Epping.

There may also be arguments that could be brought forward as to whether the Plan is **Effective** in terms of deliverability over the plan period, or **Consistent with National Policy** given the constraints and sustainability issues with South, compared to East.

Fundamentally, the evidence base confirms that East Epping outperforms South Epping as sustainable development and comprises a more viable and deliverable solution to meeting the housing need in this defined growth location.

The land at East Epping has been promoted on the basis of 2 alternative approaches, as shown in the Figure 2 Concept Masterplan, and in both scenarios, Pigeon would contend that the justified and sound approach would be to allocate growth at East Epping on the following either/or basis:-



Figure 2. East Epping Concept Masterplan - Pigeon

- 1) **A scheme consistent with the 2016 draft Local Plan and May 2017 Strategic Masterplan approach with approximately 930 homes shared between South and East. Pigeon has made representations to reinstate the frontage onto Stewards Green Road as originally promoted to have independent access to the site (as shown by the red line site in figure 2);**
- 2) **A new sustainable neighbourhood at East Epping based on Garden City principles, replacing the allocation of 950 homes South of Epping (all of Figure 2).**

A comparison of the respective benefits of the schemes against the current allocation is set out in Tables 1 and 2.

Table 1: Benefits of a combined or linked Masterplan between East and South Epping

	Land Assembly	Sustainability of Location	Green Belt	Infrastructure Requirements	Site Constraints	Access and Highways	Development Benefits
Benefits of a more sustainable scheme at East as part of a linked Masterplan with South	Site in single ownership and actively promoted.	Site within 5 minutes of train station with footpath links and in closer proximity to High street. Has ability to deliver high density in proximity to transport hub including local services and car parking provision.	Removal from Green Belt would see a moderate level of harm.	No significant requirements. Independent access recommended off Stewards Green Road.	Development needs to pay regard to landscape sensitivity.	Independent access off Stewards Green is achievable. Permeable site with good access to station and Essex Way.	Mix of housing including bungalows, self-build plots and 40% affordable. Potential primary school. Site permeability with enhanced access to Epping Station with hub facilities including retail, health and parking.
Current less sustainable option of single Masterplan at South	Western parcel (EPP.R1) split across 6 landowners and does not appear to have been promoted comprehensively. Eastern parcel has not been promoted with West	At greater distance to train station and high street, uphill from this location. Development will be heavily car reliant and will not achieve the modal shift aspiration in planning policy.	Removal from Green Belt would see a high level of harm.	Poor local highway network. Requires crossing of Central rail line with significant cost and time implications.	BAP habitat, proximity to wildlife site, noise and air quality in proximity to M25. Ancient woodland, TPOs & listed buildings. High Voltage cables and pipeline constraints.	Constrained local network. No obvious access to Western parcel. Challenges connecting both sites across rail line.	Policy requirement for Primary school (with potential relocation), neighbourhood centre and health hub.

Table 2: Benefits of strategic development at East Epping

	Land Assembly	Sustainability of Location	Green Belt	Infrastructure Requirements	Site Constraints	Access and Highways	Development Benefits
Benefits of a more sustainable scheme at East as a comprehensive Masterplan	Site is in dual ownership with agreement for Pigeon to promote.	Site within 5 minutes of train station with footpath links and in closer proximity to High street. Ability to deliver high density hub in proximity to rail station including local services and car parking provision.	Removal from Green Belt would see a moderate and very low level of harm.	No significant requirements. Independent access recommended off Stewards Green Road linking through to Stonards Hill to North to provide relief road easing pressure on Epping High Street (B1393).	Development to pay regard to landscape sensitivity. Stonards Farm is a listed building, to be incorporated into a Care Village scheme to meet the demands of an ageing demographic.	Link Road between Stonards Hill and Stewards Green Road providing benefit to local highway network, particularly Epping High Street (B1393).	Mix of housing including bungalows, self-build plots and 40% affordable. Primary school. Site permeability with enhanced access to Epping Station with hub facilities including retail, health and parking. Care Village and Country Park helping to meet significant local deficit.
Current less sustainable option of single Masterplan at South	Western parcel (EPP.R1) split across 6 landowners and does not appear to have been promoted comprehensively. Eastern parcel not promoted with West.	At greater distance to train station and high street, uphill from this location. Development will be heavily car reliant and will not achieve the modal shift policy aspiration.	Removal from Green Belt would see a high level of harm.	Poor local highway network. Requires crossing of Central rail line with significant cost and time implications.	BAP habitat, proximity to wildlife site, noise and air quality in proximity to M25. Ancient woodland, TPOs & listed buildings. High Voltage cables and pipeline constraints.	Constrained local network. No obvious access to Western parcel. Challenges connecting both sites across rail line.	Policy requirement for Primary school (with potential relocation), neighbourhood centre and health hub.

Summary

- East Epping provides a more sustainable location for growth than South Epping when assessed against the evidence base. The current approach of a Strategic Masterplan focussed on South Epping only, is not the most appropriate strategy based on proportionate evidence and taking into consideration reasonable alternatives. The current approach does not meet the test of the plan being justified and is therefore unsound.
- East Epping is the most appropriate location for sustainable growth in terms of its proximity to Epping London Underground Station, which is a 5-minute walk from the site with an existing footpath link, which would be enhanced. Accordingly, its location represents a far more appropriate opportunity than South Epping to promote a modal shift away from the use of the car and to sustainable transport choices in accordance with Policies T1 and SP3 of the Submission Version Local Plan.
- Development at South Epping is at a greater distance from the station and town centre and with journeys to both locations being uphill, encouraging private car use. The statement at page 115 of the Submission Version Local Plan that South Epping ‘maximises opportunities to focus development in close proximity to Epping London Underground Station’ is not correct when considered against the evidence and the opportunities afforded by East Epping.
- Pigeon’s concepts for East Epping have sought to focus a mixed-use, higher density hub on the part of the site in closest proximity to the rail station. This will deliver a higher density of housing in the most sustainable location, together with retail and health provision, and parking for rail commuters. This will be in accordance with Policy SP3 of the Submission Version Local Plan, the Government’s announcement on 10 April 2016 to focus development at railway stations and surrounding land, and would maximise opportunities to focus development in close proximity to the rail station.
- Policy SP3 of the Submission Version Local Plan sets out a sequential approach for site selection. When considering Greenfield sites within the Green Belt, the hierarchy sets out that those with least value to the Green Belt should be allocated first. However, the LUC Green Belt assessment 2016 defines that the parcels of land making up East Epping would only have a moderate and very low level of harm if removed from the Green Belt. By contrast the South Epping parcels would have a high level of harm. The current approach of the Sustainable Masterplan focussing on South Epping can not be justified as it is contrary to the Submission Version Local Plan’s own sequential approach and its evidence base.
- East Epping brings forward a range of additional benefits compared to South Epping including a Care Village, Country Park and mixed use hub in close proximity to the rail station, and is not subject to the same series of constraints. These include noise and air quality close to the M25, BAP habitat and wildlife site, ancient woodland, TPOs, high voltage cables and pipelines. Most significantly there are also significant infrastructure issues crossing the railway line and accessing the western parcel, as well as the need to bring together a range of landowners.
- For the plan to be justified and sound, East Epping should form either part, or all, of the Strategic Masterplan for Epping in line with the 2 alternative approaches set out within this briefing.