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Planning Policy Team  
Neighbourhoods Directorate  
Civic Offices  
323 High Street  
Epping  
Essex  
CM16 4BZ

KLW Ref: 12/179

20<sup>th</sup> April 2018

**Sent via email only**

Dear Sir/Madam

**REF: Epping Forest District Local Plan Submission Version 2017 – Representations on the finalised version of the Site Selection Report and Appendices dated March 2018.**

Thank you for inviting us to provide additional representations, following your correspondence dated 26<sup>th</sup> March 2018.

As you know we represent Croudace Strategic, the owner of Land at Stonards Hill (previously referred to by the Council in various evidence documents as site EPP-B, SR-0406ii and was included within land parcels DSR 049 & 049.1), and have been promoting the site for inclusion as a housing allocation in the Council's emerging Local Plan.

We hope the following comments will be taken into account as part of the consultation process, along with our January 2018 representations to the Epping Forest District Council Local Plan Submission Version 2017. You will note from the commentary below that we have some serious concerns over the Council's appraisal of representations submitted to date in good faith, and the procedures adopted by the Council in reaching its conclusions. We wish to be reassured therefore, that the content of this letter will be taken seriously and investigated fully.

Appendices B and C of the Site Selection Report 2018 have now been considered. It is noted that the Site Selection Report was published in March 2018, almost three months after the Local Plan Submission Version 2017 was produced. It is most unusual for an evidence document to



be produced after the main policy document it was intended to support is published. This approach is flawed, in our view, and we consider that it will have a material bearing on the validity of the Local Plan Submission Version.

Furthermore, Councillors voted in favour of proceeding with the proposed Submission Version Local Plan in December 2017. We understand that the plan was subsequently intended to be submitted to the Inspectorate for examination, in advance of all relevant evidence material to support the findings of the Plan being finalised and being made available. On this basis the legal compliance of this Plan is highly questionable. Consequently, we would be grateful if you could provide a written explanation on this please.

The emphasis of Croudace's previous representations related to the lack of a meaningful justification to allocate Green Belt land south of Epping as a housing growth area, over other more suitable sites. Moreover, this approach contradicted the findings of the Green Belt Review (Stage 2) evidence document (LUC 2016).

#### Appendix B of the Site Selection Report 2018

The following comments refer to the site selection process for Epping sites included under Appendix B, which has now become available. Firstly on a general level, the purpose of producing an updated Site Selection Report is to take account of representations made. In our view, this has not been adhered to in this instance. In particular the document advises that the Council has taken account of representations made during the Local Plan process, including those made by developers, which has led to certain sites being reappraised. This is not the case with regards to land at Stonards Hill, referred to in Appendix B1.5.2 as SR-0406ii. Detailed representations were submitted during the course of the Plan process, to challenge the constraints identified by the Council. Notwithstanding these representations, the findings of the site assessment remain exactly the same as those set out in the 2016 report, which concluded that site 406ii is unsuitable for development.

Croudace has repeatedly confirmed that the woodland areas forming part of the site would not be affected by proposed development, and that none of the TPO trees would be lost as a result of providing housing on the site. In view of this, it is clear that the 2018 assessment cannot have taken into account the representations made in 2016, as it reaches the same conclusions with respect to impact on trees and woodland as made in the previous assessment. This, despite the clear representations confirming the woodland would not be lost. Serious doubt is therefore cast over whether the plan is justified, when representations containing highly pertinent evidence have been ignored.

With regard the landscape sensitivities it is not felt that the issues identified are insurmountable. The site containment including the physical barrier of the railway line to the east, screens the site from the wider landscape, and has not properly been considered as part of the site assessment. We refer to the strategic options assessment for Epping (Appendix B1.5.2 of the 2018 Site Selection Report), which suggests that with regards the eastern expansion of Epping there is potential for landscape harm to be mitigated through design. This has not been taken into account in the assessment made in Stage 3 of the site selection process detailed in Appendix B. In addition to the south, the eastern extension of Epping was also considered a "more suitable" strategic option and it included Land at Stonards Hill within the area. It is important, therefore, that this eastern area be reconsidered as a matter of urgency. For the



reasons set out in this letter and previous representations, this area remains a more suitable and sustainable growth option for Epping.

The big anomaly of the site assessment findings (detailed under Appendix B of the Site Selection Report) is why the south Epping sites allocated under the masterplan area, are claimed to be more suitable in Green Belt terms than other sites around Epping. Again, this is wholly contrary to the findings of the 2016 Green Belt Review document that suggests otherwise. Appendix B1.6.6 of the 2018 Site Selection Report identifies that sites SR-0069/33, SR-0333Bi, SR-0113B and SR-0113A are all *“more preferable in terms of landscape sensitivity and Green Belt harm than other sites around Epping”*. In Green Belt terms, when considering these sites against the Land at Stonards Hill site SR-406ii, this statement is simply incorrect. It is essential, therefore, that the Council reconsider its justification for these sites to be taken forward for housing development. At best, the current approach is misguided.

### Appendix C of the Site Selection Report 2018

The following comments refer to the 2018 Appendix C – Settlement Proformas, in particular to the Epping Settlement Proforma. We would question why Appendix C of the 2018 Report refers to the main body of the proformas remaining unchanged, whilst the overall vision has fundamentally altered following the consultation process, to now include the release of Green Belt land to accommodate housing growth. We would argue that if the main vision for the settlements has been updated then the remainder of the previous proforma should also be updated to support and explain the findings. The following comments support this view.

The 2016 settlement proforma for Epping reiterates the importance of Green Belt land in maintaining the separation between Theydon Bois and Waltham Abbey in particular. It also highlights the findings of Stage 2 of the Green Belt Review, that a number of southern Epping sites (044.2, 045.1 and 045.2), would result in the highest level of harm, (“very high”), if released from the Green Belt for development. The vision for Epping provided in the Submission Plan now includes the following statement: *“a new vibrant community will be delivered at the south of the town. This will integrate fully and complement the existing community”*. The new “community” referred to will be built on the aforementioned south of Epping sites. These sites are proposed to deliver a total of 950 new homes identified as Epp.R1 and EPP.R2 in Policy P1 of the 2017 Local Plan Submission Version. This is a fundamental change in the Council’s spatial growth strategy and warrants the reproduction of the Proforma in Appendix C of the 2018 Site Section Report.

Furthermore the 2016 Settlement Proformas support the protection of Green Belt land specifically maintaining the important gap between Epping and Theydon Bois. The release of EPP.R1 and EPP.R2 would significantly undermine this objective. For information the Green Belt Review identified that the gap between Epping and Theydon Bois is only 1.2km from the most easterly land parcel (044.2) to the south of Epping, which is now allocated for development. Again we would question why the south of Epping is considered a more suitable location for new development over sites to the east, which would result in less harm if released, in Green Belt terms.

The Site Selection Report 2016, Appendix C Settlement Proformas, includes feedback from The Community Choices consultation, which was undertaken in 2012 (four years before the Report was produced). As such, the 2016 Proformas are outdated. The continued reliance on this evidence to support and underpin the 2018 Site Selection Report is questionable. Updated



Settlement Proformas based on the more recent evidence documents and responses from the ongoing local plan consultation process should have been produced to summarise the position of the release of Green Belt land – an important change to the emerging vision for the settlement of Epping.

We are confident that the anomalies and discrepancies identified above warrant a reconsideration of the proposed release of Green Belt land and proposed housing allocations to the south of Epping. Moreover and in light of this, further consideration of Land at Stonards Hill must be undertaken, as part of a legitimate and favourable strategic growth option to the east of Epping.

Yours faithfully



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