

## Epping Forest District Council Representations to the Draft Local Plan Consultation 2016 (Regulation 18)

Stakeholder ID	3982	Name	Philip Copsey Fairfield Partnership
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### Letter or Email Response:

Do you agree with our approach to the distribution of new housing across Epping Forest District? (See Draft Policy SP 2, Chapter 3). Objectively Assessed Need across the Housing Market Area 1. TFP objects on technical grounds to the Strategic Housing Market Assessment process that has led to the identification of 11,400 homes as the Objectively Assessed Need for Epping Forest District. 2. Paragraph 3.34 of the Draft Local Plan states that the latest review of the 2016 Population and Household Projections identify an Objectively Assessed Housing Need (OAN) of 54,600 homes for the Strategic Housing Market Area. 3. The NPPF paragraph 47 states that OAN should be met in full as far as is consistent with other policies within the Framework. 4. Paragraph 3.35 of the Draft Local Plan notes that the SHMA authorities consider that meeting the OAN of 54,600 homes would not accord with other NPPF policies on the basis of infrastructure constraints, environmental and policy designations. Instead an alternative OAN for the SHMA of 51,100 homes is set out. The Sustainability Appraisal of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area (AECOM) considered housing growth and distribution options for the West Essex and East Hertfordshire Housing Market Area. The Sustainability Appraisal identified the reason for identifying the preferred spatial option (and not the higher OAN figure) was that Harlow was 'the most sustainable location in the HMA to focus growth' and that transport modelling demonstrated that no further growth could be accommodated at Harlow in the plan period. 5. TFP consider that it is not credible to suggest that it is impossible to meet the full identified OAN figure (an additional 3,500 dwellings) across the whole of the HMA in a sustainable manner other than by growth at Harlow. 6. TFP also has objections regarding the manner in which the SHMA Update (Updating the Overall Housing Need: Based on 2014-based projections for West Essex & East Herts) addresses OAN: • The projection forward of previous suppressed trends in household formation and migration; • The failure to take account of the impact of growth pressures and unmet housing needs from London; • the treatment of population within institutional housing; and • the manner in which uplifts for market signals and employment requirements are applied. In particular, the setting aside of the uplift related to balancing jobs and workers across the HMA is challenged. It is not demonstrated or explained how the modest 7.8% increase between the 2012 and 2014-based population projections would deliver a 41% increase in workers living within the HMA (1) such that no uplift is required. Objectively Assessed Need within Epping Forest District 7. TFP object to the OAN for Epping Forest District on a practical basis: 8. TFP notes that Figure 3.5 and the accompanying text makes reference to 'reserve sites' which can be released for allocation in the future should need arise. There are no further references to reserve sites elsewhere within the Local Plan. EFDC should meet the full and properly assessed OAN and should only identify and allocate FOOTNOTE (1) See paragraph 5.40 of the West Essex and East Hertfordshire SHMA, September 2015 which applies a housing uplift to secure an increase in workers from

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18,600 to 26,400. reserve sites as a contingency over and above the properly assessed OAN. Any reserve sites are likely to involve release from the Green Belt. Green Belt reserve sites should be properly supported by the evidence base and if reserve sites are to be identified Green Belt boundaries should be adjusted now as part of this Local Plan process. 9. TFP note that there is a lack of clarity in the presentation of the overall housing figures. Figure 3.5 identifies a need for 11,400 dwellings, draft Policy SP2 provides for 11,290 dwellings and the Housing Trajectory at Appendix 5 provides for 11,164 dwellings. There is also the risk that there may be double counting between commitments and allocations. A more transparent presentation of housing numbers that fully meet a properly assessed OAN should be provided. 10. Paragraphs 3.62 - 3.64 make reference to the identified housing supply exceeding the requirement. TFP would support this as an objective to provide flexibility and to plan positively. However, in light of the previous comments, TFP do not consider that this has been demonstrated within the current Local Plan. Spatial Distribution within Epping Forest District 11. TFP support the approach to the distribution of growth within the District and the emphasis that this places on the main settlements. In view of the comments above, TFP consider there is scope for additional growth to be directed to these locations to provide a modest up lift on current allocations to ensure that settlements contribute towards meeting a properly assessed OAN. Do you agree with the proposals for development around Harlow? (See Draft Policy SP 3, Chapter 3). 12. No comment. For the two town centres and four district centres in the District the Draft Local Plan sets out a proposed primary shopping area which is intended to protect and encourage retail uses (See Draft Policy E 2 and Section 5 - Places). Do you agree with the proposed shopping areas? 13. No comment. Do you agree with the proposals for new employment development? (See Draft Policy E 1, Chapter 4). 14. TFP support the provision of new employment floorspace to meet the target of 10,000 new jobs across the plan period set out in Draft Policy SP2. 15. TFP note that the Council will be undertaking further work to identify a specific employment land requirement and allocations within the Local Plan. TFP reserve the right to comment further on this matters pending the publication of such material. Do you agree with the proposed sites in your area? (See Chapter 5) Do not feel that you have to comment on all of the areas. 16. These representations are submitted on behalf of the Fairfield Partnership (TFP) who control 22.78 hectares of land to the south of Brook Road, Epping. 17. The northern part of TFP's land holding outlined red in [the attached plan/ Figure One] below is identified as draft allocation SR-0113B. 18. TFP support the identification of allocation SR-0113B, but in the light of other allocations in the area object on a technical basis to the failure to consider opportunities associated with Brook Road recreation ground and the southern part of the TFP land control. 19. TFP is committed to the delivery of allocation SR-0113B. This site is developable and deliverable in its own right. 20. There are two further areas of land control that TFP wish to be considered as part of the Local Plan process: 21. The Brook Road recreational ground shown outlined orange on the attached plan. This offers opportunities for an enhanced alternative highway access crossing the edge of the recreation ground linking directly to Stonards Hill and potential development. Any open space lost would be re-provided elsewhere on the site in addition to full new provision in line with Local Plan standards. 22. The southern part of the TFP land control shown blue on the attached plan (reference SR-0113A). The potential allocation of other sites south of Epping west of the Central Line would provide a new Green Belt boundary and broader landscape setting for the southern edge of Epping that responds to the M25. In this context, the southern part of the TFP land control is available for: • Complementary open space or Sustainable Urban Drainage features consistent with the land remaining in the Green Belt; or • for new road links crossing the railway that may be promoted jointly to support growth to the south of Epping in tandem with the allocation of land west of the Central Line. The road link could form the basis of a revised Green Belt boundary with associated additional housing provided in this southern part of the TFP land. This would only be promoted subject to local support, and appropriate technical evidence. 23. Both of these two areas of land have been referenced in previous submissions into the Local Plan process. To ensure these are fully considered at this stage, TFP has completed two Call for Sites response forms. 24. TFP is willing to work with other promoters to ensure a comprehensive and co-ordinated approach to the planning of growth to the south of Epping. TFP has enclosed a letter of collaboration agreed with the owners of sites SR-0069/33, SR- 0069, and SR0445. 25. TFP would welcome ongoing dialogue with Epping Forest District Council on this matter. Growth at Epping 26. TFP support the approach to the distribution of growth within the District and the emphasis that this places on the main settlements including Epping. The Settlement Hierarchy Technical Paper confirms Epping jointly as one of the most sustainable locations in the District. TFP consider there is scope for additional growth to be directed south of Epping to provide a modest up lift on current allocations to ensure that settlements contribute towards meeting a properly assessed OAN. 27. The growth of Epping to the south has been correctly identified through the Report on Site Selection process as the preferred direction of growth. TFP would note that growth to the south has a number of distinct advantages over other directions of growth: • Landscape

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- The Settlement Edge Landscape Sensitivity Study confirms that land to the south of Epping is of low sensitivity and is the least sensitive direction of growth in landscape terms. • Green Belt - the Green Belt Review Stage One and Two assesses land to the south of Brook Road and to the east of Central Line as only contributing to any degree to one of the five Green Belt objectives: assisting in safeguarding the countryside from encroachment. TFP consider that this is a characteristic of all Green Belt land, and that this is not in itself a suitable basis for distinguishing between the performance of Green Belt parcels. TFP concur with the more nuanced assessment at Figure 4.6 of the Stage II review which confirms a low level of harm to the Green Belt for land south of Brook Road. TFP considers that a well-designed development on the site would not compromise the purposes and effectiveness of the Green Belt at this location. • Sustainable relationship to Epping Station and Town Centre - land to the south of Epping is in close proximity to Epping Station, and with good access to the town centre. Table 1-5 of Technical Note 7 - Sustainable Accessibility Ranking, Mapping & Analysis confirms site SR-0113a as one of the joint top ranked sites for sustainable accessibility potential. Epping Local Plan Highway Impact Appraisal Technical Note 8 - Sensitivity Testing / Car Ownership & Use Mapping also confirms that the south of Epping has lower relative levels of car ownership and use compared with other parts of the town. • Growth to the south of Epping also offers the opportunity to provide and support new infrastructure either alongside individual allocations, or collaboratively between the relevant landowners. 28. TFP support the conclusion at Appendix B1.5.2 of the Stage 3 Assessment of the Report on Site Selection which highlighted that the southern expansion of Epping "is the most favoured. It would be least harmful to the Green belt and the surrounding landscaping and would provide opportunities to promote residential development in close proximity to Epping Station". Allocation SR0113-B 29. TFP support the allocation of land under its control south of Brook Road. 30. The allocation will support a new neighbourhood for Epping in a highly sustainable location. This allocation is deliverable and developable in its own right. and can provide a mix of market and affordable homes. 31. Comprehensive information was submitted to the Report on Site Selection covering the following matters: • Ecological Appraisal Report (ADAS) - This confirms that the main ecological interest lies in the streams and woodland around the edges of the area proposed for development, and recommends that these features are retained and enhanced. A bat roost survey is recommended. • Bat Survey Report (ADAS) - This confirms some bat activity with bats commuting along the tree boundary. No bats were recorded emerging or re-entering any trees on site with bat roost potential that might be affected by the proposed development. • Arboricultural Constraints Report (ADAS) - The tree survey identifies trees and associated root protection areas of trees considered worthy of retention including trees subject of Tree Preservation Orders. ADAS believe that if the advice contained within this report is followed, it will be possible to design a development layout which integrates the existing trees on and adjacent to the site, as well as having the potential to secure and enhance the future landscape character of this area through new planting. • Noise and Vibration Assessment (WSP) - An assessment has been undertaken of the implications of noise and vibration confirms that the majority of the site can achieve an appropriate internal noise environment using conventional glazing. An area close to the railway (between 15m and 55m) would require additional measures, including the orientation and design of development. • Landscape and Green Belt Appraisal (REDACTED) - This assessment confirms the suitability of the site for development in landscape terms and the very limited visual envelope of the land. The assessment also confirms that a well-designed development on the site would not compromise the purposes and effectiveness of the Green Belt at this location. Comprehensive landscape proposals will provide for the reinforcement of tree and hedge lines, create habitat and provide for comprehensive mitigation if planting is required to be removed to secure access or infrastructure connections. • Surface Water Strategy Note (WSP) - Initial work has been undertaken on the design of a Sustainable Urban Drainage Scheme. The site lies in Flood Zone 1 and an assessment of the likely run-off from the developed area has been provided to inform the design and sizing of attenuation features. TFP will work with the Environment Agency and other relevant stakeholders to provide a comprehensive approach to managing surface and foul water. • Transport Assessment Scope (WSP) - This document will inform the production of a Transport Assessment in support of the proposals. • Archaeological Desk-Based Assessment - this confirms that there are no heritage or archaeological constraints on the site. • Access Appraisal and Feasibility Assessment (WSP). This confirms the opportunities for improving access along Brook Road and providing site access, along with the opportunities for connecting into utilities. 32. A number of preliminary master plan concepts have also been explored showing how the land might be developed. This information is not re-provided here. The above assessments support the allocation of land south of Brook Road as both developable and deliverable and provide an evidence base in support of the allocation of the land for residential development with the potential for supporting uses. 33. With regard to access from Brook Road a number of options for site access exist. Allied with measures within the existing highway the potential exists to manage road space more effectively and provide improved

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car parking and other localised improvements to provide benefits for existing residents and an appropriate standard of access. 34. In terms of broader site accessibility, the proximity to the town centre and to Epping Station give excellent opportunities for a range of transport modes to be encouraged. In terms of vehicle access initial assessment shows that the effects of the proposed development are modest and a range of options exist to provide appropriate improvements. 35. The potential exists to accommodate or support community infrastructure on or around site to ensure that housing growth is supported by appropriate infrastructure. Brook Road Recreation Ground 36. As outlined above, TFP consider that there are benefits in planning for development of Allocation SR0113-B in parallel with using Brook Road Recreation Ground to provide for an enhanced alternative highway access crossing the edge of the recreation ground linking directly to Stonards Hill and for potential development. Development of allocation SR0113-B does not rely on any changes to the recreation ground, but TFP consider that this might offer some significant local improvements. 37. Any open space lost would be re-provided elsewhere on the site in addition to full new provision in line with Local Plan standards to create an improved long-term facility and significantly enhanced open space and recreation offer in this part of Epping. This would also offer the opportunity for ancillary facilities such as car parking and changing facilities etc. Southern Part of TFP Land Control 38. The southern part of the TFP land control has been assessed as Site SR-0113A. 39. The potential allocation of other sites south of Epping west of the Central Line would provide a new Green Belt boundary and broader landscape setting for the southern edge of Epping that is not tied to existing features. Land to the east of the Central Line lies at generally lower levels than land to the west. 40. In this context, the southern part of the TFP land control could be brought forward for a number of uses that would contribute towards a wider planned extension to the south of Epping. The land might be used for the following uses: • Complementary open space or Sustainable Urban Drainage features consistent with the land remaining in the Green Belt: were a requirement for Suitable Accessible Natural Greenspace and Corridors to be adopted and justified this could be provided within this area, along with other strategic open space opportunities. • New road links crossing the railway that may be promoted jointly to support growth to the south of Epping in tandem with the allocation of land west of the Central Line. The road link would form the basis of a revised Green Belt boundary with associated additional housing provided in this southern part of the TFP land. This would only be promoted subject to local support, and appropriate technical evidence. • Sites for new facilities such as primary schools, community buildings etc. This would only be promoted subject to local support, support from other allocations and all relevant stakeholders and appropriate technical evidence. 41. TFP has reviewed the comments made in the Site Selection Report and does not consider that some of the assessments are justified: • The stage 3 assessment makes reference to air quality and landscape harm, but notes that 'these constraints can be overcome'. TFP concur that such constraints can be overcome, but would not accept that the development of land under its control need necessarily lead to air quality or landscape harm as confirmed by the Settlement Edge Landscape Sensitivity Study. • The Site Suitability Assessments note potential impacts on settlement character. TFP consider that a well-designed scheme set within an appropriate landscape framework will create a suitable new edge for this part of Epping. TFP would also note that any impacts on open space provision will be more than compensated for by new provision. Protected trees will be incorporated into the development proposal. TFP also consider that providing an appropriate offset is maintained with the M25 that no adverse impacts from air quality will arise. Do you agree with the approach to infrastructure provision being proposed in the plan? (See Chapter 6). 42. Land south of Brook Road can support and deliver all of the required infrastructure to support sustainable residential development. In particular, new highways arrangements can be provided that will take pressure off of Brook Road in the vicinity of the site improving the situation for existing residents. 43. TFP note the content of the Draft Infrastructure Delivery Plan and the comments relating to education, health, community facility and open space provision. TFP will work with the local planning authority, service providers and the local community in partnership with other developers in order to identify and deliver all relevant and appropriate infrastructure subject to need being demonstrated. This may include on- site facilities or contributions towards off-site improvements. 44. TFP support the policy requirements to deliver supporting infrastructure alongside new development (Draft Policy D1), but suggest that the word 'necessary' be added to clause C to ensure that the requirement for infrastructure reflects the tests set out within the NPPF. 45. TFP note the requirement at Draft Policy D2 to provide or improve essential facilities and services required to serve the scale of development proposed. Any such provision or improvement would need to meet the required tests set out in the NPPF, and would also be subject to viability in line with NPPF paragraph 173. 46. TFP object to the requirement at Clause D to prepare a Health Impact Assessment for schemes of over 50 units. This is a matter for the Local Plan to consider. Further detail is required in order to ensure that any such assessment is proportionate and relevant. 47. Draft Policy D3 Utilities requires improvements to be funded by developers where no

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improvements are programmed by the utility provider. TFP would note that there are obligations on utility providers to deliver access to utilities and to take account of planned developments. TFP would therefore suggest that the policy be reworded to make reference to developers and utility providers working together to ensure appropriate provision of the required utilities. 48. Draft Policy D4 requires proposed developments to contribute to the provision of new or improved community facilities. TFP is committed to working with the community to identify and support the provision or improvement of appropriate community facilities as part of the delivery of new homes on land south of Brook Road. An Interim Sustainability Appraisal has been commissioned to support the Draft Local Plan. We would welcome any comments you may have on this. (See Technical Document page). 49. TFP has reviewed the Interim Sustainability Appraisal and concur with the approach adopted regarding the merits of directing growth towards Epping to support an appropriate level of growth to continue in its role as one of the main towns within the District. 50. TFP note that at the present stage the only significant negative effect relates to Land and Waste. The assessment takes account of the protection of Green Belt that meets the nationally established objectives. In direct opposition is the positive effects assessed to arise from meeting identified housing needs. Given the particular specific circumstances of Epping Forest District, and the acknowledged need to release land from the Green Belt, it is inevitable that the assessment against these two SA topics will pull in opposite directions and effectively cancel each other out. 51. TFP would also comment that it is unclear why Option 5: Higher Growth along the Central Line is assessed as being inferior to other options with regard to Climate Change, when the commentary makes clear the benefits of this approach in reducing transport related CO2. Do you wish to comment on any other policies in the Draft Local Plan? 52. TFP support the objective to protect the natural environment at Draft Policy SP 6 the Natural Environment, Landscape Character and Green Infrastructure but would note that there may be cases where targeted interventions can be made in GI to deliver broader benefits, with compensatory new GI to be created. 53. TFP consider that greater clarity is required in Draft Policy H1, clause D regarding incorporating housing for people with support needs including older people and for self-build / custom build housing in larger scale new residential developments in certain locations and where there is evidence of unmet need. 54. Draft Policy H2 Affordable Housing: TFP note the requirement is expressed as a minimum of 40% affordable homes. TFP object to the use of a minimum: there is no basis for seeking higher levels. TFP would suggest that this is instead expressed as a target rate of 40% affordable housing subject to viability assessment. TFP would also note that the Government's Starter Homes policy will need to be reflected in this plan policy. 55. TFP note draft Policy DM4 regarding the provision of Suitable Accessible Natural Greenspace and Corridors to mitigate against potential or identified adverse impacts from recreational pressure arising from the increased population. TFP note that there is no published evidence at the present time to support this policy, the extent of space sought and the area over which the policy applies. TFP reserve the right to comment on policy provisions as they emerge. TFP would also note that were such a policy to be justified, that opportunities exist within its land control for such provision to be made. 56. Draft Policy DM5 Green Infrastructure: Design of Development seeks to 'retain....existing green infrastructure'. TFP would note that there will be a requirement in some cases to remove trees or hedgerows to provide for access to sites and other essential infrastructure. The policy should be drafted with a degree of flexibility to allow this and make provision for replacement planting by stating 'retain as far as possible, and where possible, enhance existing green infrastructure.' 57. TFP note draft policy DM17 Protecting and Enhancing Watercourses and Flood Defences seeks to set development back from watercourses and avoid the use of culverting and the natural functioning of watercourses. TFP would note that the policy needs a degree of flexibility to allow for new crossings to be made of such features in order to provide for site access and egress and other essential infrastructure which may need to cross watercourses. New accesses bridging watercourses for example may require a degree of culverting. TFP would suggest that the proviso is added to the start of clause A: 'Other than for site access and other essential infrastructure connections new development....' 58. TFP note that further viability assessment is to be undertaken. TFP note that the Local Plan's preferred approach is that all new homes should be built to Category 2: Accessible and Adaptable Homes standards, nationally prescribed space standards, water standards, district heating etc. TFP would note that such further viability assessment should take a comprehensive view of the impact of these standards alongside affordable housing on the viability of development. 59. TFP note the comment at Paragraph 4.5 that the Local Plan's preferred approach is that all new homes should be built to Category 2: Accessible and Adaptable Homes standards. The need for such requirements to be applied to all housing has not been demonstrated at the present time contrary to Planning Practice Guidance on this matter. 60. TFP object to the requirement at Policy DM20 low carbon and renewable energy for major development to incorporate infrastructure for district heating networks. The requirement to provide a network in the absence of any certainty over whether there would be a future heat and power plant to connect into will place

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an unnecessary burden on major developments and is not justified by evidence. As paragraph 4.232 makes clear, there is also a need for a base load to support an energy centre without which the viability of a district heating would be highly questionable.