

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

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Letter or Email Response:

INTRODUCTION 1.1 Quadrant Town Planning is instructed by more than 50 residents of Bury Road, Lower Bury Lane and Bury Lane, Epping (listed in Appendix 1) to object to the removal of Epping Sports Club and land to the west of Bury Lane from the Green Belt and its allocation for residential development as proposed in Policy P1 of the Epping Forest District Draft Local Plan. Figure 1: Subject site outlined in red 1.2 Quadrant has visited the site and surrounding area, assessed the site against Green Belt policy and had discussions with officers at Epping Forest District Council. Our overall conclusion is that the site fulfils the national Green Belt purposes and should not be allocated for housing. 1.3 Furthermore, there are significant site specific and local constraints which render the site unsuitable for housing. 2.0 **SITE AND SURROUNDINGS** 2.1 The site is irregular in shape and comprises two parcels of land: Epping Sports Club, which includes Epping Cricket Club, Epping Tennis Club and Epping Bowls Club and is located on Lower Bury Lane; and land to the west of Bury Lane, which comprises a large, flat field extending into open countryside. 2.2 The whole parcel extends to some 8.9 ha, with the Sports Club extending to 2.3 ha. 2.3 The site is over looked by housing on Lower Bury Lane and Bury Lane and provides significant amenity value to local residents. 2.4 Epping Sports Club performs a valuable function in providing sport and recreation for local residents. The Cricket Club was established in 1865 and the pavilion was built in 1896. The Club is very popular and currently has 6 adult teams and 6 junior teams and last year it celebrated its 150 anniversary. 2.5 Four all weather tennis courts are provided, with associated floodlighting and are well used in all seasons. This site is also home to Epping Bowls Club and has a popular outdoor bowls green. 2.6 The site is not fenced off and provides a valuable open space for local residents. 2.7 The land to the west of Lower Bury Lane affords extensive views out to the west and its characteristics are predominantly open. 2.8 Within the centre of the site is an area of ancient woodland comprising some 34 ancient trees. They form a physical barrier dividing the site and isolating land to the west of Bury Lane from the built up area of Epping. 2.9 Immediately north of site is Epping St John's C of E School. The school relocated within its grounds in 2013 and the new school building now occupies land adjacent to Bury Lane. Vehicular access to the school is via Bury Lane with pedestrian access from Lower Bury Lane. As part of the planning consent to relocate the school, Lower Bury Lane was stopped up and traffic calming measures introduced and the road is now is an important pedestrian route for school pupils. Figure 5: School children use Lower Bury Lane to walk to school 2.10 The school includes a vehicular drop-off/pick-up facility accessed from Bury Lane, but many parents use Lower Bury Lane as a drop-off and waiting point and this narrow road, together with Bury Road, comes to a standstill twice a day. 2.11 The subject site is currently designated as Green Belt in the adopted Epping Forest Local Plan, together with the neighbouring St John's School. Figure 6: Extract from 1998 Epping Local Plan 2.12 The plan shows a swathe of Green Belt extending out to the north and west of Epping. 2.13

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The urban edge of Epping is characterised by different landscape character areas. The Settlement Edge Landscape Sensitivity Study by Chris Blandford Associates shows the subject site as falling within area F3: Cobbin's Bridge, giving way to area F2: Upshire further west towards Waltham Abbey. Figure 7: Extract from Settlement Edge Landscape Sensitivity Study 2010

2.14 The report describes the area as being a patchwork of relatively regular, predominantly arable fields with occasional small patches of woodland and mature hedgerows and mature trees delineating field boundaries. The visual character is one of open views across farmland and it is our view that the subject site exhibits these characteristics.

2.15 The report advises that "Open views across this area are visually sensitive to potential new development, particularly large scale or tall vertical elements". The suggested landscape planning guidelines for the area are as follows (paragraph 3.7.22):

- Conserve the landscape setting of Epping to the south;
- Ensure that any new development within the farmland is small-scale, responding to historic settlement pattern, landscape setting and locally distinctive building styles;
- Maintain characteristic open and farmed views across the area

2.16 The Landscape Sensitivity Study confirms that the area is defined by its openness. This is consistent with the designation of the site as Green Belt.

3.0 EPPING FOREST DRAFT LOCAL PLAN Housing Need in Epping Forest

3.1 The requirement to remove sites from the Green Belt and designate them for housing stems from the Objectively Assessed Housing Need identified for the District, which is set at 11,400 dwellings for the period 2011-2033, with a residual requirement of 4,550.

3.2 Policy SP2 sets out the spatial development strategy for the District and allocates 1,640 new dwellings to Epping, some 14% of the District requirement. This is a significant allocation for the town, given its current size and environmental, highways and historic constraints.

3.3 In land area (defined as the Green Belt boundary around the town), Epping is relatively small - extending to 773 ha - in comparison to other towns within the District. Loughton, for example, extends to some 1,512 ha, Waltham Abbey to 4,240 ha, North Weald (defined as a Large Village) to 2,278 ha and Chigwell (a Large Village) to 1,568 ha (Source: Settlement Capacity Study, 2016). These larger settlements, whether defined as Towns or Large Villages, have significantly more capacity to accommodate a greater housing allocation, particularly on brownfield sites outside the Green Belt, than Epping.

3.4 The proposed allocation in Policy SP2 will lead to an exponential growth in the size of Epping. Epping (parish) currently has a population of 11,461 (2011 census) and a dwelling count of 5,312. An additional 1,640 dwellings will represent a 30% increase on the current dwelling stock in the town. The associated population growth, based on an occupancy of 2.5/dwelling, would be an additional 4,100 people, an increase of some 35%. This is disproportionate, given that it is one of the smallest settlements in Epping Forest.

3.5 It is acknowledged that the need to meet the projected population increase across the District represents an 'exceptional circumstance' which will require the removal of some sites from within the Green Belt, but it is Quadrant's view that the housing distribution and scale of allocation to Epping does not have regard to the town's constraints.

NPPF Approach to Allocating Sites

3.6 In acknowledging the need to allocate sufficient land for development, the core planning principles contained in the NPPF require the following: "Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in the Framework." And "encourage the effective use of land by reusing land that has been previously developed (brownfield land)." (paragraph 17)

3.7 Furthermore, in respect of plan making, the NPPF advises: "Crucially, Local Plans should... allocate sites to promote development and flexible use of land, bringing forward new land where necessary...and identify land where development would be inappropriate for instance because of its environmental or historic significance." (paragraph 157).

3.8 The NPPF advises that site selection should accord with the economic, social and environmental dimensions of sustainable development and that "Significant adverse impacts of any of these dimensions should be avoided" (paragraph 152).

3.9 In allocating sites for residential development, the Draft Local Plan has not had regard to the requirements of the NPPF and the need to adopt a sequential approach to the allocation of sites. It adopts an aggressive approach to the removal of sites from the Green Belt without having regard to the significant adverse impacts of doing so.

Policy P1

3.10 The subject site is annotated as SR-0132Ci and proposed to be designated for 49 new dwellings, including an element of affordable housing. It is one of a number of sites in Epping which is proposed to be removed from the Green Belt and allocated for housing in order to meet the allocation of 1,640 dwellings set by Policy SP2.

3.11 The SHLAA indicates that the site has the potential to accommodate 65 dwellings, including the relocation of Epping Sports Club (based on information provided by the site promoter). Figure 8: Extract from figure 5.4 of Draft Local Plan

3.12 However, we have significant concerns regarding the site's suitability for residential development.

4.0 SITE SUITABILITY

4.1 The Site Selection Methodology and Site Suitability Report (Arup) has been reviewed with regard to the subject site. Of the 32 criteria assessed, it is noted that the site is rated neutral against more than half of them; there are a number of positive scores for flood risk (Zone 1 and therefore low risk), and accessibility to local facilities; and we concur with these scores.

4.2 Furthermore, we also note that the

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site suitability scores negatively against a number of the criteria, for example:

- Impact on Epping Forest Special Area of Conservation: the subject site lies within 400m of this internationally protected site and the potential impacts of large scale development have not been satisfactorily addressed.
- Impact on 34 ancient trees within the centre of the site: whilst masterplanning may overcome this, the trees, which include a number of endangered native hardwood black poplar trees, are a constraint which isolate the western part of the site physically from the built up area of Epping, thereby undermining its suitability for residential development in sustainability terms.
- Impact on archaeology: existing evidence and/or lack of previous disturbance indicates a high likelihood for the discovery of high quality archaeological assets on the site.
- Loss of agricultural land: best most versatile land would be lost.
- Landscape sensitivity: the site is sensitive and new development would adversely affect the landscape character of the area.

4.3 However, we disagree with the Site Suitability Assessment on a number of counts, as follows:

- Capacity to improve access to open space: this is given a positive score, which is perverse given that the proposal is to develop housing on an existing sports and leisure facility. Relocation of the facility further out of Epping, away from the community it serves, does not address this issue.
- Access to the site: the assessment advises that the existing access off Lower Bury Lane could serve development on the Sports Club and this criterion is given a positive score. As noted above, Lower Bury Lane is wholly unsuitable for significant vehicular traffic, given it is the primary key pedestrian access to St John's School and there are no pavements for a large part of the road.
- Traffic impact: the assessment advises that the area around the site is expected to be uncongested at peak times. Again, this belies the situation on the ground. Bury Lane is the primary vehicular access to St John's School and the area is very congested at school drop off and pick up times. (See further highways comments below).

4.4 The Assessment ignores the above factors and the site should be reassessed taking these matters into account.

4.5 The process to site selection has not had regard to the need to avoid significant adverse impacts of on the economic, social and environmental dimensions of sustainable development, as required by paragraph 152 of the NPPF. Specifically, the allocation of Epping Sports Club for residential development will have a significant adverse impact in terms of: (i) the consequential displacement, or at worse loss, of the sport and recreational facilities; (ii) highways impact; and (iii) associated environmental impact of loss of open space and encroachment into the Green Belt.

5.0 SPORT AND RECREATIONAL CONSTRAINTS

5.1 The removal of Epping Sports Club from the Green Belt and its designation for housing would harm the provision of sport and recreation facilities in Epping. Paragraph 73 of the NPPF advises that: "Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up to date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision."

5.2 Epping Forest Open Space, Sport and Recreation Assessment 2012 indicates that there is an outstanding need to provide additional facilities to meet the current and future needs of the District.

5.3 Epping Forest Sports Club provides cricket, tennis and bowls facilities and the Recreation Assessment identifies deficiencies in respect of each of these sports, as follows:

Sport	2012 Provision	2012 Deficiency	Additional Need	2031 Total
Cricket	32	4	1	41
Outdoor tennis	53	0	7	60
Outdoor bowls	7	0	1	8

5.4 There is therefore a current shortfall of 4 in the provision of cricket pitches within the District. By the end of the plan period there will be a need for a total of 5 new cricket pitches to meet demand. Whilst the provision of outdoor tennis and outdoor bowls is currently adequate, there will be a need for a further 7 outdoor tennis courts and 1 additional outdoor bowls green by the end of the plan period.

5.5 In light of the deficiencies in provision of these sports facilities in Epping, there is no case to support the removal of the subject site from the Green Belt and its allocation for housing. This runs contrary to the NPPF and Sport England's A Sporting Future.

6.0 HIGHWAYS CONSTRAINTS

6.1 The area around Bury Lane and Lower Bury Lane is currently under significant pressure in terms of highways, not only due to the presence of the school and the need to maintain a safe pedestrian route for students, but also due to a general overloading of the highway network in Epping as a whole.

6.2 The High Road in Epping is over capacity for large parts of the day, particularly in the AM and PM peak. The town cannot accommodate a further 1,640 dwellings as the road network cannot physically absorb the associated traffic movements without seriously impacting on journey times and road safety.

6.3 The restricted capacity of the Bury Lane / High Road junction was highlighted at the planning inquiry in respect of the school, with Essex County Council accepting that it was operating "above the desirable capacity". This was in 2005 and more than 10 years on, the situation has become significantly worse.

6.4 The high level of congestion in Epping is acknowledged in the Background Paper on Transport, and the resultant need to designate part of the town centre as an Air Quality Management Area, due to high levels of pollutants from traffic.

6.5 Essex Highways' assessment of the likely highway impact of the proposed housing and employment allocations in the Draft Local Plan reveals the very serious situation arising in Epping, with nearly all junctions through the town at or

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over capacity during peak hours, and set to get worse with further development. Essex Highways predict that by 2026 all junctions on the High Road will be over capacity. 6.6 Mitigation is advanced in the form of a western bypass. This is not part of the Draft Local Plan and cannot be given any serious consideration. The quantum of housing allocations in Epping cannot therefore be supported in highways terms. 6.7 More specifically, it is noted that Essex Highways' capacity testing does not include the subject site. Figure 9: Extract from Figure 1 of Technical Note 1 6.8 Whilst an assessment is undertaken of J11 – the Bury Lane / High Road junction – this does not test the impact of an additional 49 dwellings on the subject site. The report, therefore, wholly underestimates the impact of additional development on the junction. Notwithstanding this, the conclusions of the report are that one arm of this junction (High Road East) is currently operating over capacity in the AM and PM peak. In 2026 and 2036 the capacity worsens, even without housing coming forward on the subject site. 6.9 Having regard to the significant highway capacity issues in Epping and specifically, in the absence of a satisfactory assessment of the highways impact of housing on the subject site, it is clear that there is no case to support the allocation of the site for housing. 7.0 GREEN BELT ASSESSMENT 7.1 We have reviewed the Green Belt Review Stage 1 (EFDC) and Stage 2 (Land Use Consultants) and note the assessment of the site against Green Belt criteria, as contained in paragraph 80 of the NPPF. 7.2 It is noted that neither document includes an assessment of areas / sites against Green Belt purpose 5 (to assist in urban regeneration) as it was considered that it was not possible to distinguish the extent to which individual Green Belt parcels deliver against this purpose and therefore could not be applied across the largely rural district. Green Belt Review Stage 1 7.3 The subject site falls within two separate assessment areas, as follows: • DSR 070: North West of Epping – includes Epping Sports Club and St John's School • DSR 069: East of Waltham Abbey and West of Epping – includes land to the west of Bury Lane 7.4 In Green Belt terms, both areas are assessed as making a strong contribution to the purposes of including land within the Green Belt, as follows: Green Belt Purpose Parcel DSR 070 Score 1. Check the unrestricted sprawl of large built up areas No contribution 0 2. Prevent neighbouring towns from merging No contribution 0 3. Assist in safeguarding the countryside from encroachment Strong 5 4. To preserve the setting and special character of historic towns Strong 5 5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land No score given Green Belt Purpose Parcel DSR 069 Score 1. Check the unrestricted sprawl of large built up areas No contribution 0 2. Prevent neighbouring towns from merging Moderate 3 3. Assist in safeguarding the countryside from encroachment Strong 5 4. To preserve the setting and special character of historic towns Relatively weak 2 5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land No score given TOTAL 10 10 7.5 Both areas scored the same with 10, indicating that each parcel made a significant contribution towards Green Belt purposes. 7.6 The Green Belt Review Stage 2 breaks down the Stage 1 parcels into small areas. The subject site falls within two separate parcels, as follows: • 070.1: includes Epping Sports Club and Epping St John's School • 069.3: includes the rest of the subject site and other land to the north and west Figure 10: Extract from Green Belt Assessment Stage 2 7.7 As with the Stage 1 Review, each plot has been assessed against the purposes of the Green Belt in accordance with the NPPF and given a performance score, as follows: Green Belt Purpose Parcel 070.1 Parcel 069.3 1. Check the unrestricted sprawl of large built up areas No contribution No contribution 2. Prevent neighbouring towns from merging No contribution Moderate 3. Assist in safeguarding the countryside from encroachment Weak Strong 4. To preserve the setting and special character of historic towns Weak Moderate 5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land No score given No score given 7.8 The overall performance score in respect of each parcel against Green Belt criteria was as follows: • 070.1: Very Low • 069.3: Very High 7.9 It will be noted that whilst the assessment in respect of 069.3 (land to the west of Bury Lane) remained the same in the Stage 1 and Stage 2 Reviews, the assessment in respect of the smaller parcel 070.1 (Epping Sports Club and St John's School) produced a very different result, and moved from a strong score to a Very Low rating. 7.10 Quadrant's view is that parcel 070.1, Epping Sports Club and associated land to the north, does perform a valid function in respect of the third Green Belt criterion, in safeguarding the countryside from encroachment and should score 'Moderate' against this purpose. The land is an open sports ground which has a strong intervisibility with Green Belt land to the west and performs a clear function in restricting encroachment of the countryside. 7.11 Furthermore, it is Quadrant's view that this parcel also performs a role in preserving the setting and historic character of Epping and should score 'Moderate' against this purpose. Specifically, the Sports Club is integral to the social fabric of the town and has been for more than 150 years. It plays a vital role in the physical and community infrastructure of Epping and it is part of the historic setting of the town. 7.12 The role of the Sports Club in Green Belt terms is also supported by the Council's stance with regard to St John's School. The Green Belt Assessment Stage 2 Report considered a number of anomalies within the Green Belt (Table 4.3), and recommended the removal of these sites – including Epping St John's School – from the green belt, in

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order to regularise the Green Belt boundary around such developments to better reflect Green Belt policy. In doing this, the report noted that 'The open playing fields to the north [of the school] can still be considered to make a contribution to Green Belt purposes.' The recommendation was therefore to remove the school buildings from the Green Belt, but to maintain the playing fields within the Green Belt. 7.13 The District Council has not accepted this recommendation and taken the view instead that the whole school site (including the building) should remain in the Green Belt, concurring with the Green Belt Assessment findings 'That the playing fields still make a contribution to the Green Belt and therefore it is not appropriate to make any change in this location'. This supports the retention of Green Belt on the school site and the rest of parcel 070.1, including Epping Sports Club. 7.14 It is therefore clear that parcel 070.1 should score more favourably when assessed against Green Belt criteria and it is our conclusion that it performs 'Moderate'. 7.15 If the subject site is to be assessed as one whole parcel to be removed from the Green Belt, the Very High score awarded to parcel 069.3 would clearly not support this. Land to the west of Bury Lane is very sensitive to encroachment and any development in this location would significantly undermine Green Belt policy. The land gives way to the west to open countryside - characterised in the Settlement Edge Landscape Sensitivity Study as being open and sensitive - and this openness is a key characteristic of the Green Belt. 8.0 DISTRICT OPEN LAND 8.1 The Draft Local Plan proposes to allocate some sites as District Open Land. This would relate to sites which are proposed to be removed from the Green Belt and which are in recreational, leisure or open space use. It is acknowledged by the District Council (Background Paper on Green Belt and District Open Land) that removing such sites from the Green Belt would make them vulnerable to inappropriate development proposals. 8.2 Without prejudice to our view that the Epping Sports Club should not be removed from the Green Belt as it performs a Green Belt function; should the District Council continue to seek its removal from the Green Belt, it should be allocated as District Open Land in order to protect it from inappropriate development. 8.3 The site meets the tests contained in paragraph 77 of the NPPF, which states the circumstances where such a designation can be used, as follows: • Where the green space is in reasonably close proximity to the community it serves; • Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and • Where the green space concerned is local in character and it not an extensive tract of land. 8.4 Epping Sports Club fulfils each of these criteria in terms of proximity to the local community, of local significance and local in character, and should be afforded protection through a District Open Land designation. 9.0 OBJECTIONS 9.1 Having regard to the above, we object to the following policies in the Draft Epping Forest Local Plan: • The subject site should not be removed from the Green Belt as it clearly meets Green Belt purposes and should remain as such within the Green Belt. Figure 3.8 should be amended accordingly. • Policy SP2: the allocation of 1,640 dwellings for Epping should be significantly reduced to a level which reflects the environmental and historic characteristics of Epping and the need for growth to be commensurate with the size of the town and its highways capacity. • Policy P1: should be amended to delete Site SR-0132Ci from its list of residential allocations. • Part of the subject site - Epping Sports Club - should be allocated as District Open Land, in accordance with Policy SP5 (See original document for list of resident names Quadrant Town Planning is representing)