



Attn: Epping Forest District Council Planning Policy Team

SUBMITTED BY EMAIL

MMCons@eppingforestdc.gov.uk

23rd September 2021

Dear Sirs,

RE: Epping Forest District Council Local Plan Main Modifications Consultation

I write to you on behalf of Cuvette Property Consulting Ltd in response to the Main Modifications Consultation for the emerging Epping Forest District Council Local Plan. Cuvette represent Paragon (North Weald) Limited, who have an interest in land immediately adjoining the North Weald Airfield. The site in question extends to approximately 16 acres and lies to the north-east of the Airfield, south of the A414 and west of Church Lane. I have enclosed a site plan at Appendix 1 ('Outline Landscape Masterplan') which shows the site in the context of North Weald Airfield.

The draft Local Plan suggests that after taking into account early delivery during 2011 – 2016, there is a residual requirement for 16-19 ha of employment land for the period 2016 - 2033. To meet this need the Council propose to allocate 23 ha of land across five sites, which is a marginal increase above their requirements. It's worth noting that the Council's economic evidence relies upon information from 2017 and based on our experience working on promoting and delivering a range of employment sites it's highly likely that the actual need for employment land in the District - especially logistics floorspace driven by the growing online retail sector during the pandemic - far exceeds what the Local Plan is looking to deliver. With regards to the supply and demand of warehousing space nationally, Savills reported in their July 2021 Big Shed Briefing¹ that 24.41m sq ft of warehouse space was transacted in the first half of 2021 which is 82% above the long-term average for the first half of a year. This take-up follows a record-breaking year in 2020 which saw new leases signed for 50.1m sq ft of warehouse space which was 80% higher than the long-term average². Savills July 2021 report notes that supply has fallen at its fastest pace ever and now stands at 25.08m sq ft, a fall of 6.93m sq ft since the start of year meaning that vacancy of warehousing stands at 4.37% which is the lowest level since they started recording data. This stark national trend of increased demand and acute supply is applicable to Epping Forest and we suspect that future assessments will conclude that 23 ha of employment land will not meet the District's needs until 2033.

¹ Savills: Big Shed Briefing (July 2021) (https://www.savills.co.uk/research_articles/229130/316116-0)

² Savills: Big Shed Briefing (January 2021) (https://www.savills.co.uk/research_articles/229130/309570-0)

Cuvette Property Consulting Ltd

Thorpe House | 17 Dormer Place | Leamington Spa

Warwickshire | CV32 5AA

Telephone | 01926 357 320

Cuvette Property Consulting Limited Registered in England 07707075



Nevertheless, one of the sites allocated to meet the District's need is the North Weald Airfield which is proposed for removal from the Green Belt and delivery of 10ha of B1/B2/B8 development.

The Paragon site has been actively promoted to the Local Plan and was proposed for inclusion as part of the North Weald Airfield Masterplanning work undertaken on behalf of the Council by Allies and Morrison in 2014, which forms part of the Local Plan evidence base. The inclusion of Paragon's land with the Airfield allocation would have created a long-term, permanent and defensible boundary to the Green Belt. However, the proposed exclusion of Paragon's land will lead to an illogical and indefensible Green Belt contrary to the National Planning Policy Framework (NPPF). Paragraph 140 of the NPPF explains that:

*140. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. **Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.** Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans. (authors emphasis)*

In our view, the allocation of the Airfield while the Paragon site is excluded and retained as Green Belt land does not satisfy paragraph 140, as the Green Belt boundary does not satisfy the permanence test. A simple solution to this problem is set out in paragraph 143(c) of the Framework which says:

143. When defining Green Belt boundaries, plans should:

c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;

To ensure the longevity of the Green Belt boundary we suggest that Paragon's land is removed from the Green Belt alongside the Airfield and safeguarded as a reserve employment site to meet longer-term development needs. The site would then be available as employment land for future Local Plan's or a Local Plan review, should any of the allocated sites be undeliverable or if the District's employment land requirements were to increase. As referred to above, given the overall market trends fueled by a range of economic and social factors including Covid-19 which has exacerbated a move towards online retailing, but also changes to supply chains brought about by Brexit, we strongly suggest that the plan will not deliver sufficient employment land as currently proposed.

It's worthwhile noting that the Council's Stage 2 Green Belt Assessment (August 2016) prepared by LUC concluded that Paragon's land was a less important part of the Green Belt when assessed against the NPPF's tests than the Airfield. The scores from the assessment are provided in Table 1.



Site (ref)	Test 1	Test 2	Test 3	Test 4	Summary
Paragon (010.2)	No contribution	Moderate	Moderate	No contribution	Moderate
Airfield (010.3)	No contribution	Moderate	Relatively strong	No contribution	High

Table 1 - Stage 2 Green Belt Assessment (August 2016) prepared by LUC

It is logical to suggest that the allocation of the Airfield will further diminish the extent to which the Paragon site satisfies or contributes to the role and purposes of land within the Green Belt, adding further weight to adopting the paragraph 143(c) approach. We believe a more forward looking and holistic approach is needed to both Green Belt boundaries, but also to ensure additional flexibility to meet a range of economic development needs. We do not believe the current approach set out in the Local Plan is sound with regard to these issues.

In summary, it is our request that Paragon’s site is removed from the Green Belt alongside the Airfield to create a logical, defensible and permanent Green Belt boundary for the long-term. The site should be safeguarded as a reserve employment site to meet longer-term development needs of the District, should this be part of a future Local Plan or a Local Plan review.

Yours sincerely,



Rory O’Reilly MRTPI

For on and behalf of Cuvette Property Consulting Ltd

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E | [Redacted]



Appendix 1 – Outline Landscape Masterplan

Cuvette Property Consulting Ltd

Thorpe House | 17 Dormer Place | Leamington Spa

Warwickshire | CV32 5AA

Telephone | 01926 357 320

Cuvette Property Consulting Limited Registered in England 07707075