

LAND AT STONARDS HILL, EPPING

PLANNING REPRESENTATIONS

In response to

EPPING FOREST DISTRICT LOCAL PLAN – SUBMISSION VERSION 2017

On behalf of



JANUARY 2018

PREPARED BY

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1 INTRODUCTION

- 1.1 These representations have been prepared by Kember Loudon Williams LLP, on behalf of Croudace Strategic (hereafter referred to as 'Croudace') in response to Epping Forest District Council's (EFDC) Local Plan – Submission Version 2017. In particular, to make the case that the proposed Submission Version is unsound due to the findings of The Green Belt Review not supporting and being contrary to EFDC's proposed Green Belt amendment and housing strategy for Epping, detailed under Policy P1. As such the Submission Plan is fundamentally flawed, and we strongly urge EFDC to reconsider Land at Stonard's Hill as an appropriate site for new housing
- 1.2 As part of the ongoing work on the Local Plan, EFDC has confirmed that current Green Belt boundaries, established in the 1980s, will need to be amended if the Council is to meet its needs for housing and employment growth in the period up to 2033. As part of the Submission Document, proposals for Green Belt boundary amendment are submitted, including Green Belt sites in Epping.
- 1.3 Croudace is the owner of land at Stonards Hill, Epping (previously referred to by EFDC in various evidence documents as site EPP-B, SR-0406ii and is included within land parcel DSR 049 & 049.1) and has been promoting the land for inclusion as a housing allocation in the Council's emerging Local Plan.
- 1.4 This submission details the merits of the site as a location for much-needed new housing and presents the case for including the site as a housing allocation over the other Green Belt allocated sites included in policy P1 of the Submission Version.
- 1.5 Section 2 of this submission sets out the characteristics of the District, the detailed context of the EFDC Local Plan and an explanation of why Epping is a suitable location for accommodating growth over the plan period.
- 1.6 Section 3 reviews the characteristics and surroundings of the site and details why it is a highly sustainable location that justifies rolling back the Green Belt to deliver much needed growth.
- 1.7 Section 4 outlines Croudace's proposals, whilst section 5 considers the planning merits of allocating the site for residential use, and altering the Green Belt boundaries to release this site, taking into account the provisions of the National Planning Policy Framework (NPPF) in terms of sustainability.
- 1.8 Section 6 offers an appraisal of the assessment criteria used to justify EFDC's Green Belt Review. The section challenges the assessment of the site, and compares the findings against the three other Green Belt sites that have now been allocated for housing.

- 1.9 Finally, Section 7 draws conclusions, which justify the inclusion of the Stonards Hill site as a future housing allocation.

2 THE LOCAL PLAN CONTEXT

Characteristics of Epping Forest District

- 2.1 Epping Forest District is predominantly rural and located within the Metropolitan Green Belt on the outskirts of Greater London. Approximately 92% of the District is Green Belt, hitherto resulting in significant constraints to development.
- 2.2 Epping Forest itself is a key feature of the District and is designated as a Special Area of Conservation. There are several ancient woods within the District and a total of 8 Sites of Special Scientific Interest (SSSIs), 9 Local Nature Reserves (LNRs), and over 220 Local Wildlife Sites (LoWS). The District also benefits from a rich heritage, with over 1,300 Listed Buildings and 25 Conservation Areas.
- 2.3 Waltham Abbey, Epping and Chipping Ongar are market towns, whilst Buckhurst Hill and Loughton have evolved to become the two largest urban areas in the District.
- 2.4 The District benefits from excellent public transport connections, including direct links to Central London via the London Underground, and high quality bus links between neighbouring towns and villages. It also benefits from easy access to the strategic road network, where the M25 runs east west and the M11 runs northwards. The A414 is also a key strategic route that runs east-west through Essex and crosses the District from Harlow to Ongar on the way to Chelmsford and the east coast.
- 2.5 Taking into consideration the high environmental quality of the area, the ease of access to the London job market and the generally high accessibility within the area, the District as a whole is a desirable place to live. This inevitably has led to high demand for additional market and affordable housing.

The Epping Forest Local Plan (EFLP)

- 2.6 EFDC has acknowledged that there is a need to release Green Belt land in order to provide sufficient new housing and employment opportunities in the period up to 2033.
- 2.7 It has recognised Epping as a suitable location for releasing some Green Belt land to support new housing growth in addition to developing several existing town centre brownfield sites. The preferred spatial development option for Epping in order to achieve the identified housing need of 1,305 new homes is to intensify development within the town centre and to expand the settlement to the south.

- 2.8 In relation to spatial options, ARUP's Site Selection Report 2016 concludes that a southern expansion would be a more suitable strategic option due to being the least harmful to the Green Belt and surrounding landscape. It would also provide opportunities to promote residential development in close proximity to Epping station. We strongly disagree with the conclusion that the release of the southern sites would not affect the Green Belt for the reasons set out in Section 6.
- 2.9 Furthermore, we should also highlight that the 2017 update to the original Site Selection Report by Arup is acknowledged to be incomplete, with crucial appendices missing including individual site assessments. The report was therefore not complete at the time the authors of the Sustainability Appraisal completed their work or when Councillors voted to authorise consultation and submit the Local Plan Submission Version. For these reasons the Submission Version appears legally deficient and we have identified this separately in other representations to EFDC.

Suitability of Epping For Growth

- 2.10 According to the 2011 Census, Epping Town¹ has a total of 12,430 residents, which represents approximately 14% of the District's population.
- 2.11 It is a 'tier 1' settlement which offers a large choice of shops, schools, employment and recreational opportunities. The settlement has a wide range of facilities, which reduces the need for residents to travel outside the town for day-to-day purposes. This reduced need to travel is also evidenced in the 2011 Census findings, which show that in Epping car usage for travelling to work is well below district, regional and national averages.
- 2.12 Within the town there are a number of large employers, providing opportunities for Epping residents to travel to work either on foot, by bicycle or by public transport. Such employers include the District Council and St Margaret's Hospital which offer a range of job opportunities. Not surprisingly the proportion of Epping residents that walk to work is higher than the district average (5.4% compared to the district average of 4.1%).



Figure 1: Site Location – Town Wide Context

- 2.13 The town also has a wide range of community and leisure facilities, including doctors' surgeries, sports facilities, hotels and a community hall. Furthermore, according to the Council's studies, Epping High Street is ranked 2nd of the 6 main centres in the District in respect of its retail offer. This is no surprise in the light of the range of shops (anchored by a Tesco supermarket) and the presence of a high number of multiple retailers such as Boots, M&S 'Simply Food' and Next. There is also a wide choice of restaurants, financial services and high and low end comparison retailers within the town.
- 2.14 In respect of educational opportunities, within Epping there are 9 pre-schools and day care nurseries, 4 primary schools and a secondary school. These provide a wide range of choice for children to access local facilities within walking distance.
- 2.15 Epping is situated 20 miles north east of Central London. The Epping London Underground station is the last stop on the Central Line and provides a direct service to both the City and West End of London. The journey time to Liverpool Street Station is approximately 37 minutes.
- 2.16 The town also benefits from direct links to the strategic road network (as mentioned in paragraph 2.4). Access to the M11 from Epping is 3.9 miles to the north and Junction 26 of the M25 is 4.5 miles to the southwest.
- 2.17 Notwithstanding the suitability of Epping for significant future housing growth due to its location and the availability of existing essential services, we question the site selection process in relation to Green Belt sites around Epping, and why other seemingly less suitable sites (namely EPP.R1 & EPP.R2) have been brought forward as

proposed allocations over our site. This is the basis of our submission and the supporting information submitted attempts to demonstrate why the housing allocations for Epping need to be reconsidered.

- 2.18 A context plan, showing the site in relation to the town's key facilities, access routes, employment and service opportunities and the surrounding hinterland is included at **Appendix 1.**

3 THE SITE AND SURROUNDINGS

- 3.1 The site is situated to the north east of Stonards Hill, adjacent to the former Epping to Ongar London Underground line (as outlined in Figure 2). The site extends to approximately 10 ha of which 4 ha are woodland and the remainder is grassland. Access to the site is via a gate on Stonards Hill where there is a 200-metre road frontage that can accommodate a safe and direct access.
- 3.2 Immediately to the north of the site lies Stonards Hill Recreation Ground, which is well screened and contains football pitches, tennis courts, children's play parks, skate ramps and general informal recreational areas. To the west lies open undulating land and to the north west there is an existing residential area between the site and Epping Town Centre. All of the above lie within 800metres of the site as identified on the Context Plan in **Appendix 1**.

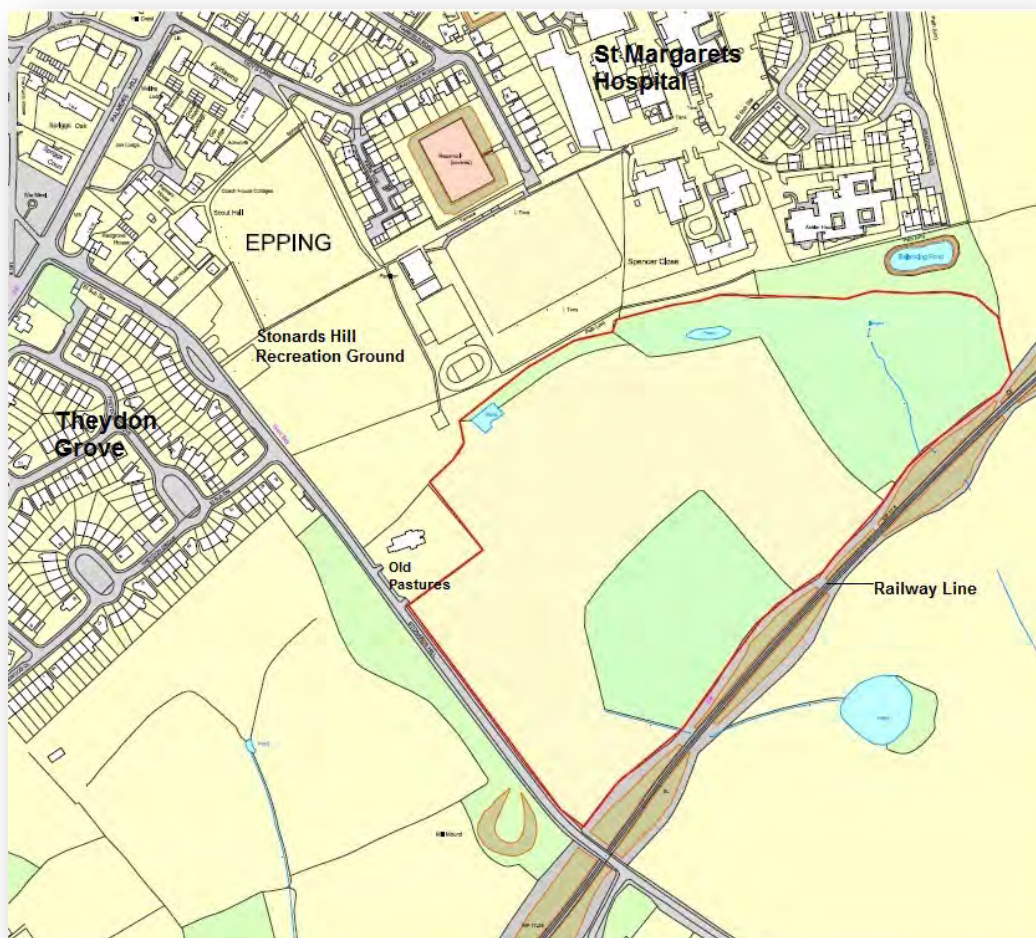


Figure 2: Site Location – Immediate Context

- 3.3 The site is bounded by trees and hedgerows of diverse nature and quality that provide a strong sense of enclosure. Within the north eastern part of the site is High Wood and Ash Wood occupies an area adjoining the south eastern boundary. Both of these areas of woodland, along with a further area on the opposite side of Stonards Hill, are covered by blanket Tree Preservation Orders. High Wood is also designated as a Local Wildlife Site.
- 3.4 The site is characterised by undulating topography.



Figure 3: Gentle undulating topography of the site

- 3.5 There are no listed buildings, Conservation Areas or Scheduled Ancient Monuments that would be affected by the development of the site, which is privately owned with no rights for public access.
- 3.6 The site is located within Flood Zone 1 which indicates that there is no known risk or history of flooding.
- 3.7 Adjoining the western corner of the site is a single residential dwelling 'Old Pastures'.

4 THE PROPOSED ALLOCATION

- 4.1 Croudace is promoting land at the identified site as a housing allocation for approximately 150 dwellings. This capacity is based upon 6 ha of unconstrained land and deliverable land to be developed at a density of between 25 and 30 dwellings per hectare (dph). Such a density range is considered appropriate in the context of the site's transitional location between countryside and existing built development.
- 4.2 The conclusions of Stage 3 of the Site Selection Assessment by Arup 2016 estimated that the site could accommodate 324 dwellings on 10.11ha, which took into account the whole site. Croudace have always maintained that any development of the site would be on existing grassland only and the existing woodland would be respected and maintained. The yield estimate did not properly reflect the nature of the site, the characteristics of the surrounding area and the crucial fact that all of the woodland area and protected trees would be retained. As such the Assessment made by Arup at the time, and accepted by EFDC, was incorrect and the intentions of Croudace were misrepresented. If the site was assessed, in the knowledge of the above, and for a lower density scheme, then the outcome of any assessment is likely to have been entirely different. Particularly in light of the reasoning behind not taking the site beyond Stage 3 of the Assessment process relating to loss of protected trees and impact on a Biodiversity Action Plan (BAP) site.
- 4.3 Croudace seeks to deliver a mix of market and affordable accommodation in a range of dwelling types and tenures in a location with good access to employment, education, retail and leisure facilities.
- 4.4 Development of the site could also deliver wider community benefits such as providing the opportunity to formalise the provision of public access to areas of woodland within the site, subject to the appropriate ecological safeguards being put in place first.

- 4.5 As previously mentioned a safe vehicular access onto Stonards Hill can be provided. Scope also exists to provide good pedestrian links between any new development and the Stonards Hill Recreation Ground.

Opportunities and Constraints

- 4.6 Early thought has been given to identifying the key features that will require mitigation in the event of development. An 'Opportunities and Constraints' plan has therefore been produced to set the parameters for future design work.
- 4.7 In summary, the strengths of the site include the very strong defensible boundaries that would prevent any long-term encroachment into open countryside. Other opportunities include the ability to provide good pedestrian links to the Town Centre and the neighbouring recreational facilities.
- 4.8 Constraints that will require careful consideration include the need to protect and maintain the existing woodlands. The topography of the site will also require a careful and imaginative detailed design approach.
- 4.9 'Opportunities and Constraints' will be explored further as the design process evolves. In the interim, a preliminary Development Principles Plan has been prepared to identify the key parameters to be applied when introducing new housing onto the site. The plan also shows how development at the site would integrate with existing infrastructure and the town as a whole.
- 4.10 The 'Opportunities and Constraints' plan and the Development Principles Plan are included at **Appendix 2**.

5 KEY PLANNING CONSIDERATIONS

- 5.1 This chapter addresses the key planning issues relevant to the future allocation of the site, land at Stonards Hill, for residential purposes, including consideration of the site in the context of relevant NPPF objectives.

Suitability for Housing

- 5.2 Paragraph 30 of the NPPF states that Local Planning Authorities should support patterns of development that facilitate the use of sustainable modes of transport. This is of particular relevance to the site because of its proximity to shops, schools, services and employment opportunities (**See context diagram – Appendix 1**).
- 5.3 Paragraphs 47 and 50 of the NPPF state that local planning authorities should ensure that their Local Plans meet the full, objectively assessed, need for housing and deliver a wide choice of high quality homes.
- 5.4 Taking into account the above housing objectives, it is evident that the site is situated in a highly sustainable location. Whilst priority should be given to suitable sites within existing settlement confines when allocating land for new development, such opportunities are in finite supply. As part of the Local Plan Submission Version, only 355 of the total number of dwellings required in Epping to meet estimated growth, are to be provided in the town centre. As such EFDC have accepted the need to release Green Belt land in order to meet housing need, and Croudace agree wholly with this strategy. However, they disagree with the choice of sites made as being considered the most suitable to fulfil this strategy, and maintain that Land at Stonards Hill is most appropriate in Green Belt terms (discussed in more detail in Section 6).
- 5.5 The site is situated very close to St Margaret's Hospital and the District Council's Offices, both of which are major local employers. There are also excellent links to public transport, leisure opportunities and to sports and recreational facilities, including the Town Council's neighbouring recreation ground.

- 5.6 The development of the site at the scale proposed would deliver a significant number of affordable homes to help reduce the local deficit between identified need and the delivery of such housing.
- 5.7 The West Essex and East Hertfordshire Strategic Housing and Marketing Assessment – Affordable Housing Update 2017 (SHMA 2017) suggests that the unmet need for affordable housing in EFDC in 2016 is 665 and the future need for the remaining plan period to 2033 is 2851. As such the allocation of this Green Belt site could make a valuable contribution towards the provision of much needed affordable housing.
- 5.8 As part of the Local Plan Site Selection process, the assessment of the site (0406ii) did not proceed past Stage 3. The reasons given for the site not being suitable were due to it scoring poorly against several criteria, including loss of TPO trees, impact on landscape and a BAP priority habitat. It was felt that the latter was insurmountable and the site should not be taken forward for further consideration.
- 5.10 As also clarified in previous planning submissions relating to the promotion of the site for housing, the need to preserve and enhance the quality of the 4 hectares of woodland is of paramount importance. Accordingly, the proposals for the development of the site focus on the existing grassland areas.
- 5.16 A suitable buffer zone will be maintained between the woodlands and any built development to ensure the integrity of wildlife habitats.

Impact upon the openness of the Green Belt

- 5.17 Given the need to release Green Belt land to achieve the required level of housing growth, Croudace consider that their site can make a valuable contribution to the delivery of new housing in a sensitive and responsible fashion. The implications of releasing the site from the Green Belt to accommodate new housing are thoroughly discussed in Section 6.

Landscape Considerations

- 5.18 Paragraph 110 of the NPPF states that in preparing plans to meet development needs, the aim should be to minimise adverse effects on the local and natural environment.
- 5.19 David Huskisson Associates (DHA), a firm of Chartered Landscape Architects, has undertaken a preliminary landscape and visual assessment of the site. The full assessment is available at **Appendix 3** which accompanies this Planning Submission.
- 5.20 In summary, the site lies in local landscape character area D1, regarded in the EFDC Landscape Character Assessment as being of overall high sensitivity.
- 5.21 The DHA report concludes that should the site be developed, landscape and visual changes would be likely to be minor and of no more than very localised significance. The report also confirms that the most significant landscape features on the site are the two woodlands and the hedgerow to the north. If the site is allocated for development these features, together with the drainage pattern and ponds, should be protected and appropriately managed for the long term. These objectives could be achieved by a planning condition requiring a Landscape and Ecological Masterplan.

Biodiversity Potential

- 5.22 Corylus Ecology has undertaken an extended phase 1 habitat survey. The full assessment is provided separately at Appendix **5**.
- 5.23 The report concludes that the grassland and tall ruderal vegetation with scattered scrub, which occupy the main body of the site, are considered to be of negligible importance, with no notable plant species identified.

- 5.24 Potential impacts upon protected species were assessed in relation to bats, reptiles and dormice. The areas of suitable habitat for reptiles include the tall ruderal field margins and the area of tall ruderal and scrub in the site's western corner.
- 5.25 The site offers suitable habitat for both foraging and commuting bats, the key areas being the woodlands and species rich hedgerows. However, the diversity within the site is relatively limited for bats as the structure of the woodland is fairly poor with few trees supporting potential for bats.
- 5.26 Within the vicinity of the site 3 ponds were recorded. Both Ponds 2 and 3 were recorded as having 'low' potential for Great Crested Newts (GCN), due to the likelihood of their drying out annually. Pond 1 to the north of the site is classed as 'Average' under the HSI assessment and may be suitable for use by GCN.
- 5.27 The woodland areas and the hedgerows were considered to be of low quality for use by dormice. No field signs were found of badgers.
- 5.28 Further ecological survey work would be required to inform any detailed development proposals.
- 5.29 In respect of possible mitigation measures, any new hedgerows would need to be planted with native species and be species rich to support biodiversity and to provide food and shelter for a range of wildlife.

Highway and traffic implications

- 5.30 COTTEE Transport Planning has been instructed by Croudace to review transport matters associated with the allocation of land at Stonards Hill. A full assessment is provided separately at **Appendix 4**.
- 5.31 In summary, the Transport Assessment considers the transport impacts and the sustainability credentials of the site in the context of a residential development

comprising 150 dwellings. It concludes that a satisfactory access to serve the site can be achieved, and a design solution is included in the document.

- 5.32 The analysis of the local road network has identified that the Stonards Hill / Palmers Hill junction is at capacity, but that improvements to the junction including the widening of Stonards Hill to provide a two lane approach; closing off the minor arm of Lindsey Street on the opposite side of the junction; and a minor widening of Palmers Hill would mitigate the impact of the development.
- 5.33 It is understood that Epping Town Council (ETC) is currently seeking the closure of the narrow Lindsey Street link to prevent regular damage to The Green and to enhance the setting of the war memorial. These objectives could be realised as part of the development of the site.
- 5.34 The site offers scope for new and improved pedestrian/cycle connections through the adjacent Council Recreation Ground. Such network connections would ensure that the new housing would be well placed for walking and cycling to the town centre, hospital, schools and other important destinations in Epping. It is therefore concluded that the site is highly accessible for the town centre and other local facilities by sustainable travel modes. It should therefore be considered favourably when selecting sites for new housing in Epping.

Social and Community Opportunities

- 5.35 The site is well located in relation to the existing sport and recreation facilities available at the Stonards Hill Recreation Ground. The development would be designed to reinforce existing movement links and to provide direct access to these facilities.
- 5.36 There is also scope to provide a financial contribution to upgrade and improve the existing facilities within the Recreation Ground. A package of appropriate enhancements would be drawn-up and agreed following engagement with ETC and the local community, if felt necessary.

- 5.37 Significant community recreational benefits could be achieved by opening up areas of woodland within the site for public enjoyment. Appropriate additional connections to the local pedestrian/cycle network would be provided in this respect.

Impact Upon Neighbouring Amenity

- 5.38 Whilst the site is accessible and in close proximity to shops, services and employment opportunities, it also benefits from being bounded on all sides by predominantly non-residential neighbours. Unlike a number of other housing site options under consideration, where severe direct impacts and landscape change would adversely affect many existing residents, a modest development of land at Stonards Hill, would have minimal, if any, impact on nearby residents.
- 5.39 It is evident that the development of the site could also benefit the security of users of the neighbouring recreation ground through increased surveillance.

6 Assessment of Green Belt Review

- 6.1 In order to consider the release of suitable green belt sites to accommodate new development in EFDC, a Green Belt Review has been undertaken. Stage one of the review was completed in 2015 and Stage 2 in 2017. The review sought to identify the contribution of 61 strategic parcels of Green Belt land in the District against the specific purposes, set out in the NPPF.
- 6.2 When considering the suitability of sites for release, due regard must be paid to the five purposes served by Green Belt (*NPPF para 80*):
- 1. to check the unrestricted sprawl of large built-up areas;*
 - 2. to prevent neighbouring towns merging into one another;*
 - 3. to assist in safeguarding the countryside from encroachment;*
 - 4. to preserve the setting and special character of historic towns; and*
 - 5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*
- 6.3 The first stage of the review process identified broad locations that benefitted from further assessment, including land surrounding Epping. Our site was included within a larger parcel of land referred to as 'o' - DSR 049, and the report concluded that the larger site scored an overall total of 8 out of a potential 20 points. The assessment scoring was 0-5 points against each of the above purposes (1-4). The parcel scoring method is provided below.

Score	
0	No Contribution
1	Weak
2	Relatively Weak
3	Moderate
4	Relatively Strong
5	Strong

Figure 4 Parcel Scoring Method

- 6.4 The limitations of the Stage 1 site analysis in relation to Croudace's site are fundamentally felt to be due to the size of the land parcel considered. The overall Stage 1 site 049 is a 157.26 ha site, and our site is only 10ha, therefore naturally inconsistencies in the findings are likely to occur. As such, it makes more sense to analyse the Stage two findings, which focus on a smaller parcel of land, which includes land at Stonards Hill, in a parcel 17.72 ha in size, as identified in Figure 5 below. This land parcel, interestingly, includes the recreation fields, football ground and playground area at Stonards Hill, as shown below. Notwithstanding this, the findings in Stage 2 are considered more appropriate for assessment analysis than Stage 1 of the Review.

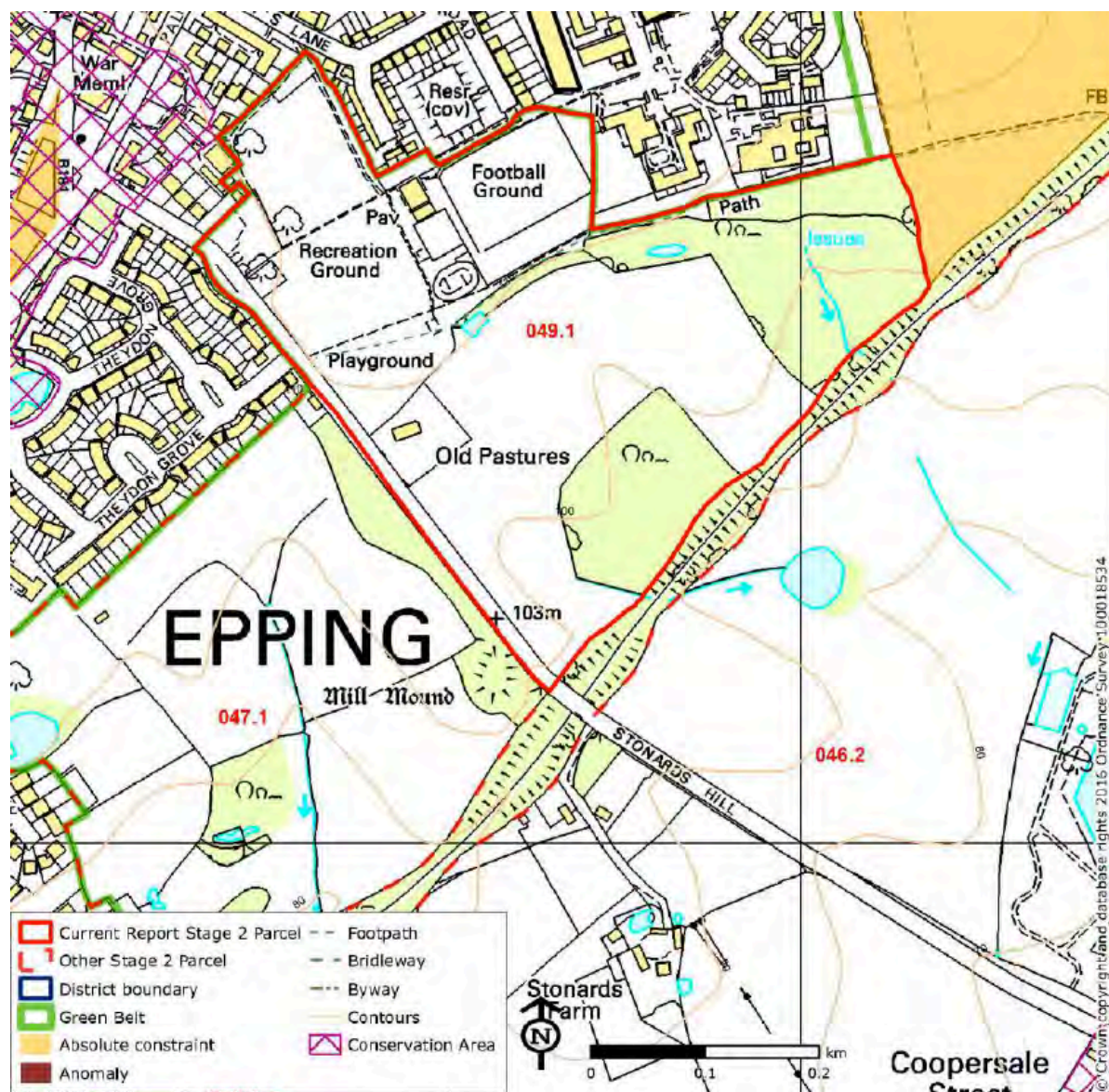


Figure 5 Green Belt Review Stage 2 Assessment Map for 049.1

- 6.5 Based on the above reasoning, the assessment of the land at Stonards Hill, as part of the larger land parcel 049.1 is provided as follows, against the relevant green belt NPPF purposes, and some of the findings are challenged accordingly.

1. Checking the unrestricted sprawl of large built-up areas

- 6.6 Epping is a market town where there is no real evidence of an enduring history of urban sprawl that requires attention. For the most part, Green Belt policy has been effective to date.

- 6.7 The “large built up areas” referred to under this purpose and context include London, Harlow, Cheshunt and Hoddesdon. Due to this land parcel being so remote from any of these areas, the land contributes very little to this purpose. As such it was found to have “no contribution”. We are in agreement with this finding.

2. Preventing neighbouring towns merging into one another

- 6.8 The closest neighbouring town to the land parcel is North Weald Bassett, which is approximately 2km north of the site. The findings of the Stage 2 Review concluded that if the land were released from the Green Belt then the gap between Epping and Coopersale would be reduced. This would in turn affect the *perception* between Epping and North Weald Bassett. However other constraints over the land between Epping and North Weald Bassett also exist, including the Epping Forest SSSI, which also aim to prevent the merging of settlements.
- 6.9 On this basis, the Review considers the land included in parcel 049.1 to have a “relatively weak” contribution to the 2nd Green Belt Purpose. We would tend to agree with this conclusion, due to a gap existing between the towns already but due to the towns being far enough away for the gap not to be affected.

3. Assisting in safeguarding the countryside from encroachment

- 6.10 The assessed site 049.1 adjoins the settlement boundary to Epping to the north and northwest and is surrounded by urban features, including the former railway to the south east, Stonards Hill road to the south west and the settlement of Epping and St Margaret’s Hospital to the north. It performs a transitional role between existing built development and the countryside that lies beyond the railway line. Development on the site would not represent encroachment into the wider countryside.
- 6.11 All of these features identified ensure that the site has strong and defensible boundaries, which would prevent future urban sprawl on the edge of Epping. Of

the sites available and assessed to date, 049.1 therefore represent the least intrusive and most contained site for a Green Belt release.

- 6.12 The overall landscape quality of the countryside surrounding the site is fair to good. However, in site specific terms, it is clear that the woodlands are in need of management. Unauthorised use for informal recreation has had a harmful effect in reducing the overall Landscape Quality of the site to Fair, in our opinion. It should also be noted that in landscape terms the site and the area immediately adjacent to it is undesignated at either the national or local level, which suggests a landscape of low value.
- 6.13 Notwithstanding this, the Review concluded that the outer part of the parcel (which relates to land at Stonards Hill) *“is likely to compromise the openness of the Green Belt by reducing the gap between Epping and Coopersale and therefore being perceived as encroachment. The outer part of the parcel is characterised by steeper topography upon which new development is likely to be visible and be perceived as encroachment into the wider countryside”*. As such the Review concluded that the site has a “relatively strong” contribution to the third purpose of the Green Belt.
- 6.14 We strongly disagree with this assessment and argue that the Review has fundamentally underestimated the importance of the Epping to Ongar railway, which is a strong physical barrier, located along the outer southeast edge of the site. The railway provides a strong defensible boundary against encroachment into open countryside beyond, in the direction of Coopersale. This is one of the key characteristics and opportunities of the site, as detailed in Appendix 2.
- 6.15 Furthermore, it is felt that due to the inclusion of Stonards Hill recreation ground within the site, urbanising features such as hardsurfacing to play areas, car parking and tennis courts exist, in addition to various buildings within the site, including the pavilion, results in the countryside uses being associated with some *“urbanising influence”*.

- 6.16 For these reasons it is felt that the assessment conclusion of the site based on the parcel's contribution to purpose three of the Green Belt, should be changed from "relatively strong", to a "moderate" contribution.

4. Preserving the setting and special character of historic towns

- 6.17 The Review concludes that the parcel of land itself *"provides a physical and visual barrier that limits the relationship between the parcel and the historic core of Epping, to the south-east"*. It goes on to say, *"the open character of the Green Belt land in this parcel is considered unlikely to be important to the setting or significance of the historic town"*. Notwithstanding this assessment, due to the close proximity of the site to the Conservation Area, it was deemed that the parcel's contribution to purpose four of the Green Belt was "moderate".
- 6.18 This assessment is made on the basis of the whole site, which includes the recreation ground adjoining the settlement boundary to Epping, which is land outside of Croudace's land holding.
- 6.19 Land at Stonards Hill site, if considered separately to the recreation ground is self-contained in a peripheral location, away from the historic core. As such the assessment for this land alone should be considered to provide "no contribution" to purpose 4 of the Green Belt. This is because it is far enough away from the Conservation Area, not to form part of its historic setting.

5. Assisting in urban regeneration, by encouraging the recycling of derelict and other urban land

- 6.20 The Stage 1 and 2 Reviews did not make an assessment on the sites contribution of purpose 5 of the Green Belt. As such, we should highlight that on the basis of the above re-assessment of the Stage 2 Green Belt Review findings, there is a compelling case for a Green Belt release in relation to Land at Stonards Hill, at a scale which would make a meaningful contribution towards meeting growth aspirations. The site represents an appropriate location for a modest scale release

of Green Belt land, which would have minimal impact upon the overall Green Belt and its objectives.

- 6.21 The overall Green Belt Stage 2 Review concluded that if site 049.1 were released from the Green Belt then the resultant harm would be “high”. However we would argue that on the basis of the above reassessment, the harm classification should be downgraded to “moderate”.

Green Belt Comparison of Land at Stonards Hill Site and Competing Sites

- 6.22 As part of the Green Belt Review process, other sites around Epping were also considered, in particular reference should be made to the Green Belt land south of Epping, subject to the proposed Green Belt amendment for the purposes of allocating the land as the south of Epping Masterplan area, referred to as EPP.R1 and EPP.R2. In terms of the Green Belt Review (Stage 2), this proposed masterplan area is made up of land from three separate land parcels, 044.2, 045.1 and 045.2 as identified in the below maps.

Stage 2 Assessment

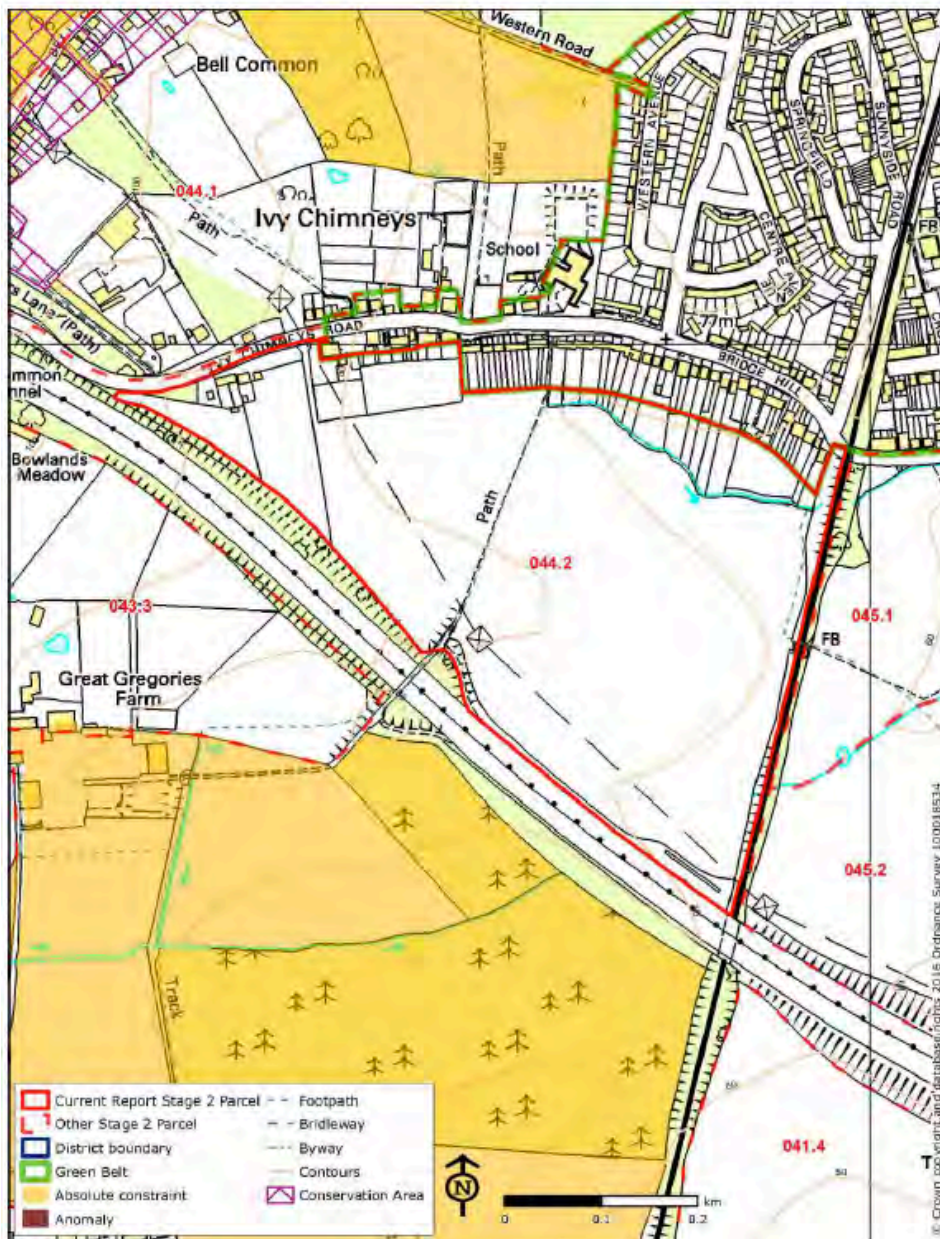


Figure 6 Land parcels 044.2 of the Green Belt Stage 2 Review

Stage 2 Assessment



Figure 7 Land parcels 045.1 & 045.2 of Green Belt Review Stage 2

6.23 Also provided for completeness is the proposed Site Allocations Map for Epping, which provides some locational context as to where these comparable Green Belts sites are with relation to Land at Stonards Hill.

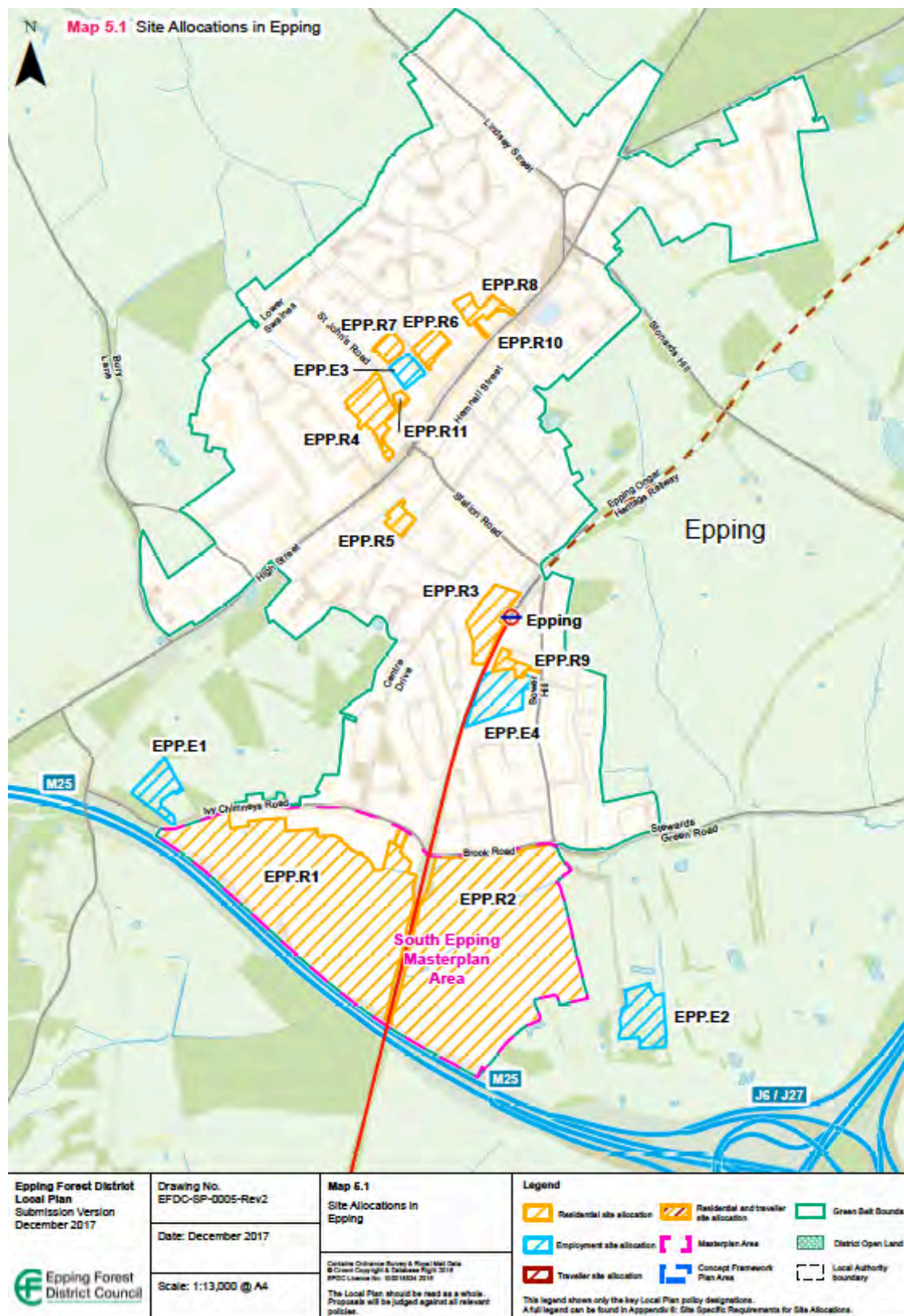


Figure 8 Site Allocations For Epping, Policy P1 of Local Plan Submission Version

6.24 Croudace, the landowners of land at Stonards Hill, are naturally aggrieved to see the above sites EPP.R1 and EPP.R2 allocated for housing and released from the Green Belt over their site, particularly in light of the Green Belt Review concluding that all three land parcels (044.2, 045.1 and 045.2), which form the new masterplan area, scored higher in terms of resultant harm if released, than the land parcel which includes their site – 049.1. In fact, whereas 049.1 land at Stonards Hill scored “high” (which we would argue should be downgraded to “moderate”) in terms of resultant harm, the other three identified sites to the south of Epping all scored “very high”.

6.24 A table comparing the assessment findings according to each Green Belt Purpose is provided below for clarity.

Green Belt Purposes	Parcels Contribution to the Purposes of Green Belt			
	Site 049.1	Site 044.2	Site 045.1	Site 045.2
1st Green Belt Purpose	No Contribution	No Contribution	No Contribution	No Contribution
2nd Green Belt Purpose	Relatively Weak	Moderate	Relatively Weak	Moderate
3rd Green Belt Purpose	Relatively Strong	Strong	Strong	Strong
4th Green Belt Purpose	Moderate	Relatively Strong	Relatively Weak	Relatively Strong
Summary of Resultant Harm	High	Very High	Very High	Very High

Figure 9 Comparison of Green Belt Sites table

6.25 As can be seen above, there appears to be compelling reasons why each of the three southern Epping sites would result in significant harm to the purposes of the Green Belt if released. Sites 044.2 and 045.2 have a greater contribution on purposes 2 and 4 of the Green Belt than Land at Stonards Hill (049.1) and all three southern sites contribute more in terms of purpose three of the Green Belt than site 049.1.

- 6.26 Focusing firstly on purpose two – preventing neighbouring towns from merging into one another, all three sites are situated closer to a neighbouring town (Theydon Bois), than Croudace's site, Land at Stonards Hill. More specifically, the gap between Epping and Theydon Bois is 1.2km at the furthest east land parcel 044.2, whereas the gap between Epping and North Weald Basset to the north (in relation from 0.49.1) is approximately 2km.
- 6.27 In relation to purpose three of the Green Belt – assisting in safeguarding the countryside from encroachment - all three southern Green Belt parcels are considered to provide a strong contribution, due to the topography in each site being highly visible from wider views. Development of these parcels is felt to result in a sense of encroachment into the wider countryside.
- 6.28 Land parcels 044.2 and 045.2 provide stronger contributions in terms of preserving the setting and special character of historic towns – purpose four of the Green Belt. 044.2 lies adjacent to the Bell Common Conservation Area but is separated from Epping Conservation Area by 20th Century development. It does however contribute to the setting of Bell Common Conservation Area and as such provides an important transition in the landscape between Epping Forest and the town.
- 6.29 Continuing with the purpose four assessment, potential development of site 045.2, particularly from higher ground within the parcel (Gardeners Barn in the vicinity of Flux's Lane) would impact on views from the historic town of Epping, and its importance as a compact medieval and post medieval market town. As such this land parcel contributes to the setting and perception of Epping.
- 6.30 On this basis, we consider it appropriate for EFDC to reconsider their Green Belt review, in light of the significantly high levels of resultant harm that would arise from releasing land within parcels 044.2, 045.1 and 045.2 from the Green Belt.

7 CONCLUSION

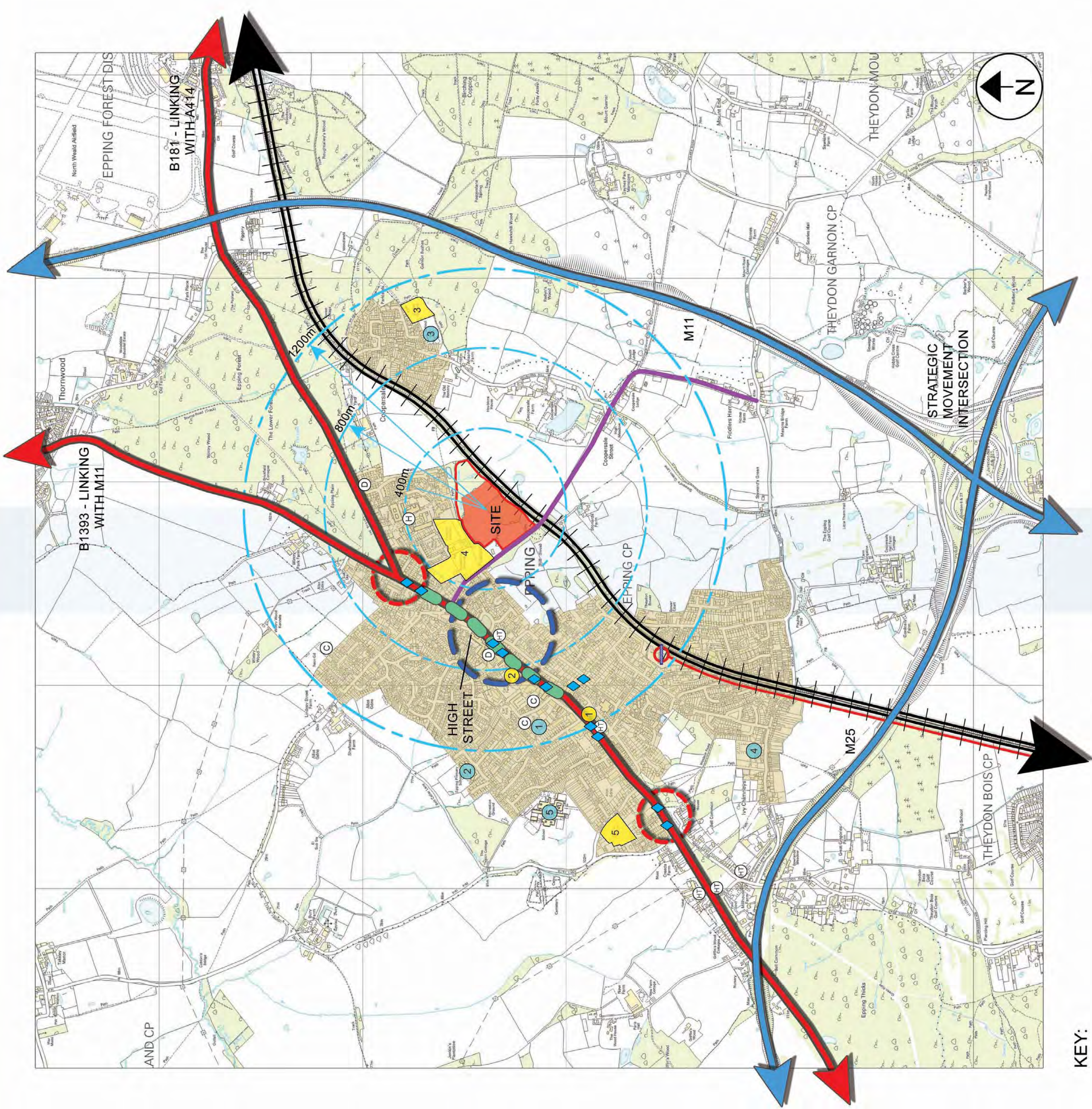
- 7.1 Croudace is promoting land at Stonards Hill, Epping for inclusion as a future housing allocation as part of the Epping District Local Plan.
- 7.2 Epping is ideally situated and suitable for growth. It is a 'tier 1' settlement with a wide range of shops, services, employment opportunities and recreational facilities. When compared to other settlements it displays a reduced need for local residents to travel on a day to day basis. It is situated 20 miles to the north east of Central London and the Epping Central Line London Underground station provides a direct service to both the City of London and the West End. Frequent bus services provide enhanced links to other nearby towns and associated economic and social opportunities.
- 7.3 Whilst the site is located within the Green Belt, its release would make a valuable contribution towards meeting the District's objectively assessed housing need, as detailed in Section 6. Furthermore, it has been independently assessed by the Land Use Consultants Ltd as being a site more favourable for release from the Green Belt than sites to the south of Epping (044.2, 045.1 & 045.2). The findings of the Green Belt Review were that significant harm would result if these sites were released.
- 7.4 The site, Land at Stonards Hill, is located in close proximity to shops, employment opportunities and schools. As mentioned previously there are also good public transport linkages with bus routes widely available in Palmers Hill and the London Underground station a short distance away which provides excellent links to Central London. In a more local context the site adjoins Stonards Hill Recreation Ground providing immediate access to formal and informal sports and other recreational facilities. All key facilities are located within 800 to 1200 metres of the site (see **Appendix 1** which includes 400m, 800m and 1200m walk isochrones).
- 7.5 Development of the site would provide the opportunity to preserve and enhance areas of woodland and open space that could be made accessible for the enjoyment of new and existing residents.

- 7.6 From a detailed planning perspective, the site is well defined and contained by existing features that will ensure that its development would not set a precedent for future encroachment of development into the Green Belt, beyond the railway to the southeast of the site, as discussed in Section 6.
- 7.7 The ecological and landscape integrity of the site would be maintained and enhanced through a sensitive approach to development. Releasing the site from the Green Belt would not result in any significant harm to the locality, which would benefit greatly from the delivery of much needed new market, and affordable housing.
- 7.8 For the above reasons, we strongly suggest that EFDC reconsider its proposed housing allocations for Epping of sites EPP.R1 and EPP.R2 and the proposed amendment to the Green Belt, in order to release these sites from it. We urge EFDC to reconsider land at Stonards Hill, as a suitable site to accommodate future housing.

APPENDICES

Appendix 1

Context Plan




KEY:




SITE BOUNDARY




NORTH




PRIMARY NODE: RETAIL/COMMERCIAL CORE




ARRIVAL POINTS




HIGH RESIDENTIAL DENSITY




EXISTING UNDERGROUND RAIL




DISUSED SECTION OF RAILWAY




MOTORWAYS: M11 AND A414




PRIMARY ROUTES LINKING WITH M11 AND A414




SECONDARY ROUTES - STONARDS HILL LEADING TO COOPERSDALE STREET




400m, 800m AND 1200m ISOCHRONES (400M = 5 MIN WALK)



EPPING UNDERGROUND STATION



BUS STOPS: 213, 541, 575 AND 577 SERVICES



PRIMARY SCHOOLS (+ SPACES)


1. EPPING JUNIOR SCHOOL (221)

2. EPPING INFANTS SCHOOL (151)

3. COOPERSDALE & THEYDON CORNER CoIE PRIMARY SCHOOL (119)

4. IVY CHIMNEYS PRIMARY SCHOOL (251)

5. ST. JOHN'S COIE SECONDARY SCHOOL (777)



SPORTS AND RECREATION


1. EPPING SPORTS CENTRE

2. CONCEPT FITNESS


3. COOPERSDALE CRICKET GROUND

4. STONARDS HILL RECREATION GROUND


5. EPPING CRICKET CLUB GROUND




DOCTORS SURGERY



HOSPITAL



COMMUNITY HALL



HOTELS AND ACCOMMODATION

Appendix 2
Opportunities and Constraints Plan
and
Development Principles Plan





