

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

Stakeholder ID	3853	Name	Hayley
			Mason On behalf of B the Middle

Method	Letter
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Date	12/12/2016
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Letter or Email Response:

Epping Forest District Council Draft Local Plan 2016 Beech Farm, High Road, Loughton, IG10 4JJ Epping Forest District Council (the Local Planning Authority or LPA) are currently in the process of producing a new Local Plan, with the current draft undergoing consultation until 12 December 2016. I write in response to this consultation on behalf of **....Redacted....** in relation to the above site. The site was submitted as part of a previous Call for Sites exercise in 2008, however the site is not proposed for allocation within the current Draft Local Plan. This letter would like to reiterate the benefits of the site, and how the site does not meet all of the purposes of including land within the Green Belt and should therefore be considered for housing development. The site did not proceed past Stage 3 of the assessment process as it was thought that the site scored poorly in terms of its proximity to the Epping Forest Special Area of Conservation (SAC) and harm to the Green Belt. We set out below the reasons why we believe this site should be reconsidered and is suitable for future housing development.

Proximity to Epping Forest SAC It is not disputed that the site lies within close proximity to the Epping Forest SAC. However, due to the size and shape of the site, as shown on attached drawing reference 16.3931/M003, the majority of any proposed development would sit behind the line of the existing residential development. Indeed, it would largely be in line with the existing development at Avenue Gate to the south of the site. There are also a number of existing dwellings either side of the existing access to the site, and along the frontage of High Road/A121. It is considered that there is absolutely no difference between the proximity of these dwellings to the SAC, and the limited frontage of the proposed site in terms of its relationship to the SAC and proximity of development. As such, given that it is only the 11 metre frontage of the site access that is adjacent to the Epping Forest SAC, and that the existing dwellings would be in closer proximity than any proposed new development, it is not considered that there would be a significant impact on the protected site.

Purpose of the Green Belt The NPPF sets out at Paragraph 80 that the Green Belt serves five purposes, these being:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The site is located in Loughton, between two established residential developments to the immediate north and south. There is a distinct separation between Loughton and Buckhurst Hill at this point and Beech Farm does not play a role in keeping these settlements apart. The development of the site would not encroach into or have an adverse effect on Epping Forest and the SAC, as set out above. It is therefore considered that its inclusion within the Local Plan for future housing development would not be contrary to the purposes of checking unrestricted sprawl of large built-up areas, or preventing neighbouring towns merging into one another. As well as being bounded by existing residential communities to the north and south of the

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site, there is also existing development beyond the western boundary, including the tracks of the Central Line of the London Underground train network. The inclusion of this site would therefore not have an adverse effect on the purpose of safeguarding the countryside from encroachment as the site is already bounded by existing development on three sides. It is not considered that the development of the site would have an adverse impact on preserving the setting of the historic town of Loughton. Whilst Loughton does have a rich history, the historic areas of the town are now surrounded by significant modern development, including the inter-war housing development of Spring Grove/Newham Close/Summerfield Road/Hillcrest Road to the north of the site. The development of the site would not detract from the fifth purpose of the Green Belt in assisting urban regeneration and encouraging the recycling of derelict and other urban land. Including this site within the allocations for future development would not restrict development from occurring on existing brown field sites. As such, it is not considered that the site fulfils the purposes of including land within the Green Belt and its allocation for residential development would not have an unacceptable impact on the Green Belt. Indeed it is stated within the Stage 2 assessment of the Site Proforma for developer meetings for sites not proposed for allocation, that the site is "identified as a potential regeneration area", that the "proposed density reflects the character of the area", and that "development is not likely to have an impact on the existing character of the area". The principle of additional housing in this part of Loughton has already been established for the land to the immediate south, which is far less visually connected to the main settlement of Loughton itself. The site is undeniably sustainable and can deliver much needed additional housing in an already established residential area. It is therefore requested that the site be considered for inclusion within the Local Plan for future housing development in Loughton.

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