

# Representations on Epping Forest District Local Plan Submission Document (Regulation 19)

**On behalf of Mr Martin Backes**

## Land at Bridge Hill, Epping

## January 2018



## **1. Background and overview**

- 1.1 These representations on the Epping Forest Local Plan Submission Version (LPSV) are submitted by Strutt and Parker on behalf of Mr M Backes, and in respect of land at Bridge Hill, Epping.
- 1.2 A plan showing the site is provided as **Appendix 1** to this representation. It should be noted that the site abuts the proposed residential allocation, site SR-0069.
- 1.3 The LPSV proposes that the site is allocated for development as part of the South Epping Masterplan Area under Policy P1.
- 1.4 The site adjoins the existing settlement boundary of Epping, on the southern side of the town, and is a predominantly greenfield site located to the rear of existing residential gardens serving dwellings on Bridge Hill.
- 1.5 The site measures approximately 0.35 ha and is not subject to any physical constraints that would restrict its potential development for housing. It is located within Flood Zone 1 – land least at risk of tidal or fluvial flooding, and suitable for any type of development from a flood-risk perspective. It is not within or near any areas subject to any environmental or ecological designations that would be restrict its deliverability.
- 1.6 The site is located immediately to the north, and adjacent to, site SR-0069 which has been assessed in the EFDC plan-making process and considered in detail through the 2016 site assessment process.
- 1.7 Representations were made in respect of the site in response to the Regulation 18 consultation on the Local Plan, setting out how the site was considered to be sustainable and deliverable for residential development.
- 1.8 Following a rigorous site assessment process, site SR-0069 was identified by EFDC as being suitable for residential allocation, and is proposed as such through the Epping District Draft Local Plan (2016).
- 1.9 The site that is subject of these representations is sandwiched between the Draft Local Plan (2016) proposed allocation SR-0069 and the existing residential enveloped of Epping. Indeed, without its inclusion within the allocation, it would result in a small island of Green Belt surrounded by residential development. Clearly this would not contribute to the purposes of the Green Belt but would instead undermine the integrity of it.
- 1.10 The inclusion of the site within the proposed South Epping Masterplan Area within the LPSV is considered sound, for the reasons set out in this representation.

## **2. Policy SP2 – Principle of amending the Green Belt boundary in Epping Forest District**

- 3.1 The principle of reviewing the Green Belt through the Local Plan in order to meet development needs is considered sound.
- 3.2 The current Green Belt boundary was allocated in the now out-of-date Development Plan.

- 3.3 National planning policy places great emphasis on the need to significantly boost housing land supply, and to ensure Local Plans meet housing need. The NPPF sets out the core planning principles, which should underpin plan-making and decision-taking. These including the following:

“Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. (NPPF paragraph 17).”

- 3.4 The Local Plan must be ‘sound’ in order for the Council to be able to adopt it. The National Planning Policy Framework (NPPF) confirms at paragraph 182 that if a Local Plan is to be sound it must be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- 3.5 There is a current acute shortage of housing within Epping Forest District, and the wider housing market area, as identified through the West Essex and East Hertfordshire Strategic Housing Market Assessment (SHMA, 2015), and subsequent updates. Indeed, the most recent (2017) update confirms that there is a need for 12,573 homes in Epping Forest District between 2011 and 2033.
- 3.6 The Council has undertaken a review of the amount of residential development that can be accommodated within the District through various sources of supply. The Local Plan evidence base has clearly demonstrated that objectively assessed housing needs cannot be met without review of the Green Belt boundary and the allocation for housing development of some land currently allocated as Green Belt in the current, but out-of-date, Development Plan.
- 3.7 Accordingly, it is evident that exceptional circumstances exist which justify review of the Green Belt boundary through the Local Plan, as per paragraph 83 of the NPPF.
- 3.8 The NPPF confirms that the preparation of a Local Plan is the appropriate vehicle through which changes to the Green Belt boundary should be made (paragraph 83).
- 3.9 Review of the Green Belt and the allocation of land to meet development needs is considered justified, effective, consistent with national policy and necessary in order to ensure the Local Plan is positively prepared

#### **4 Policy SP2 – Direction of growth to Epping**

- 4.1 Epping clearly represents a sustainable location to accommodate additional growth. It is the principle settlement in the District, with a population of 11,461 (Census 2011); benefits from a range of service, facilities and employment opportunities; and is one of only two settlements in the District which contain a Town Centre, as per the LPSV and Table 5.2.
- 4.2 The direction of further growth to Epping is further justified by its characteristics, which are considered in the Epping Forest District Settlement Hierarchy Technical Paper (2015). This identifies Epping as being at the top of the settlement hierarchy.
- 4.3 The Epping Forest District Settlement Hierarchy Technical Paper (2015) further confirms the sustainability of Epping as a location for additional housing, noting that it includes the majority of services and facilities that the assessment used to analyse the settlement hierarchy. Epping also benefits from opportunities to utilise sustainable modes of transport, reducing the reliance on the private car, with resulting sustainability benefits.
- 4.4 The direction of additional growth to Epping is a sustainable approach which is considered sound.

#### **5 Policy P1 – allocation of land at Bridge Hill, Epping as part of EPP.R1 and the South Epping Masterplan Area**

- 5.1 Notwithstanding the lack of availability of the Epping Forest District Local Plan Site Selection Report (2017) Appendix B – Assessment of Residential Sites, it is recognised that adjoining land was identified as being a sustainable and deliverable site through the 2016 site assessment process. The 2016 Epping District Draft Local Plan proposed allocation of adjoining land (SR-0069/33 and SR-0069) following from this assessment work.
- 5.2 Land at Bridge Hill, Epping shown in Appendix 1 to this representation is sandwiched between the existing settlement boundary of Epping and proposed allocation SR-0069.
- 5.3 The previous iteration of the Local Plan (the Draft Local Plan (2016) failed to propose its allocation. We considered this to be a failing of the previous iteration of the Local Plan, and set out representations explaining why. In summary, it was noted that if the adjoining land to the south were to be allocated but land at Bridge Hill were not to be, this would leave land at Bridge Hill as a small island of Green Belt surrounded by development / proposed development. Land at Bridge Hill would no longer serve the purposes of including land in the Green Belt.
- 5.4 The site measures approximately 0.35 ha and is not subject to any physical constraints that would restrict its potential development for housing. It is located within Flood Zone 1 – land least at risk of tidal or fluvial flooding, and suitable for any type of development from a flood-risk perspective. It is not within or near any areas subject to any environmental or ecological designations that would be restrict its deliverability.

- 5.5 It adjoins the existing settlement, existing residential development and represents a logical extension to Epping.
- 5.6 The site would make a positive contribution to the South Epping Masterplan Area. It will afford the opportunity to not only accommodate additional housing to help meet need, but also to provide pedestrian and cycle links between the masterplan area and Epping centre, further enhancing the sustainability of South Epping Masterplan Area.
- 5.7 Policy P1 K iv) requires the Strategic Masterplan for South Epping to make provision for a new vehicular, pedestrian and cycling bridge over the railway line (which currently bisects the Masterplan Area). We acknowledge the benefits of ensuring the eastern and western sides of the Masterplan Area are connected with pedestrian and cycling links. However, we would suggest that rather than require a new bridge over the railway line (which will clearly have cost implications), land at Bridge Hill has the potential to facilitate pedestrian and cycle links between the western half of the Masterplan Area and Bridge Hill, from which in turn pedestrian and cycle links could be provided into the eastern portion of the Masterplan Area. This would ensure the Masterplan Area is interconnected and negate the need for the LPSV to expressly require a new bridge over the railway line.
- 5.8 For the above reasons, the inclusion of land at Bridge Hill within the South Epping Masterplan Area is considered deliverable, will enhance the sustainability of the proposed Masterplan Area and will ensure that it is not an anomalous island of Green Belt left which would serve none of the purposes of including land within the Green Belt.
- 5.9 We understand that the Epping Forest District Local Plan Site Selection Report (2017) Appendix B – Assessment of Residential Sites will be published in due course. We would expect our client's land at Bridge Hill to be addressed within this assessment. We reserve the right to submit further representations on this once it is available.