



Ms L Phillips  
MA MSc MRTPI  
Epping Forest District Council  
Civic Offices  
323 High Street  
Epping  
Essex CM16 4BZ

Our ref: JAC/11933

23<sup>rd</sup> January 2019

Dear Ms Phillips,

#### **MATTER 4 THE SPATIAL DISTRIBUTION / DISTRIBUTION OF DEVELOPMENT ISSUE 13**

**Issue 1:** The Councils' site selection process does not appear to follow the settlement hierarchy. In addition there does not appear to have been any assessment as to whether the level of growth for each settlement relates to the capacity of its infrastructure, or indeed relate to whether capacity exists, such that more development could be accommodated.

In order to properly inform the process it is necessary for site selection to follow the assessment of the most sustainable settlements. If it does not then clearly the plan will not be the most appropriate strategy.

We otherwise rely on our letter of 17<sup>th</sup> January 2018.

#### **Matter 4 Issue 2**

In this respect we rely on our evidence set out in our letter of 17<sup>th</sup> January 2018 under the heading Policy SP1 and SP2 special development and strategy.

#### **Matter 4 issues 4 - Is the distribution of development justified in respect of the need for, and approach to, Green Belt release**

As set out in our earlier submission we are concerned that only three of the five purposes of the Green Belt have been tested in the site selection methodology.

Whilst not wishing to repeat earlier submissions, the fact that sites have not been properly considered in respect of the five purposes means that changes to the Green Belt boundary have simply not been informed by robust assessment.

planning transport design environment infrastructure

t. 01622 776226 e. [info@dhaplanning.co.uk](mailto:info@dhaplanning.co.uk) w. [www.dhaplanning.co.uk](http://www.dhaplanning.co.uk)

Maidstone Office, Eclipse House, Eclipse Park, Sittingbourne Road, Maidstone, Kent, ME14 3EN

DHA Planning Ltd. Registered in England. Registered number: 2683290





It is my position that the Council's failure to apply objective criteria to the way in which different parts of the Green Belt contribute to openness and indeed developments would comprise encroachment means the plan cannot represent the most appropriate strategy or at least there is not enough information currently conclude that it is the most appropriate strategy.

As I have set out before, the Green Belt Review (Stage 1) September 2015 is at too large a grain to use for site selection purposes. As to the Phase 2 report by LUC dated 2016 this did look at parcels in greater detail, albeit parcels raised greatly in size, with the parcel within which our clients land sits O.35.7 being one of the larger sized parcels.

The summary of harm in the assessment is stated to be very high. Again we submit that the Green Belt Review, at both Stages 1 and 2 as referred to is not suitable for assessing individually promoted sites.

Sites surrounded on 3 sides by development, with sub-urban road and street lights is ranked the same as land surrounded by open countryside and served by a rural lane.

As stated it is essential for any Green Belt releases to be related to the sustainability and services of the settlement to which it relates. In addition site selection should be based on a much more localised consideration of how the site performs against the purposes of the Green Belt.

There are elements of those sites selected that do not follow normal planning judgements and to this regard we consider the Councils approach unreasonable.

Whilst set out in our earlier submissions a particular concern for example relates to sites where there are footways and lighting and similarly where perhaps 50% or more of the site boundaries are developed areas. These are undoubtedly matters that go to the heart of the degree for encroachment that would occur following the development of any site and the failure to properly consider this means that the overall process is flawed and unsound.

Yours sincerely,

John Collins

Director  
John.Collins@dhaplanning.co.uk