

EFDC: Local Plan Examination

Hearing Statement

**Matter 4: Spatial Strategy/Distribution of
Development**

Monday 25th February 2019

Participant No. 19AD0113

Introduction:

David Lock Associates (DLA) act for the Fairfield Partnership (TFP) who control land within the South Epping Masterplan Area (SEMPA). This is designated as ***EPP.R2 Land South of Epping East – approximately 500 homes*** in *Policy P1 Epping* in the Epping Forest Local Plan Submission Version 2017. DLA & TFP have actively participated in meetings with District Council officers and other stakeholders to progress the South Epping Masterplan.

1.0 ISSUE 1

Does the distribution of development in the Plan place too much reliance upon the Garden Community Sites around Harlow at the expense of testing the capacity of the other settlements in the District?

- 1.1 TFP offer no comment on the specific issues of Garden Community Sites around Harlow. Our comments about the approach to the distribution of development are set out in response to Issue 2 below.

2.0 ISSUE 2

Beyond the Harlow area, is the distribution of development in the Plan justified having regard to the defined settlement hierarchy?

- 2.1 TFP generally support the approach to the distribution of growth within the district. It appropriately places emphasis on the main settlements of which Epping is one. The main settlements are the appropriate locations for future growth. There is scope for additional growth to be directed towards these locations. This is particularly relevant if there is a need for the District to provide additional sites to meet an increased OAN housing growth figure.
- 2.2 TFP offer no further comment on the relative distribution of growth around the district.

3.0 ISSUE 3

Is the distribution of employment land in the Plan justified in the light of the distribution of housing?

3.1 TFP offer no comment on this issue.

4.0 ISSUE 4

Is the distribution of development justified in respect of the need for, and approach to, Green Belt release?

- 4.1 TFP controls the proposed allocation EPP.R2 – Land South of Epping East within the SEMPA. The background analysis that identifies South Epping as the preferred direction of growth for reasons of its low landscape and Green Belt sensitivity is supported, and clearly represents the most appropriate direction for growth consistent with the spatial distribution strategy (Policy SP2). In addition, its location near to (and within walking distance of) the Epping London Underground Station and the general lack of constraint are significant. Technical studies confirm that EPP.R2 is not impacted by flood risk, ecology, air quality, noise, infrastructure or ownership complications. TFP submitted a Landscape and Green Belt Appraisal which accompanied our earlier representations in January 2018. This confirms that EPP.R2 could be properly developed for residential and other compatible uses. TFP disagrees with conclusions of the Green Belt Review: Stage 2 that if parts of EPP.R2 were to be developed that there would be a moderate to high potential “level of harm”.
- 4.2 With careful design at the Masterplan, outline planning application and reserved matters stages the site can be readily integrated with the existing urban framework of the town. It is capable of being assimilated into the surrounding landscape without unacceptable impact to the wider landscape character. The realignment of the Green Belt boundary can be readily achieved because of a clearly defined and permanent boundary (the M25 Motorway and embankment).
- 4.3 Matter 15 Issue 2 specifically deals with site specific issues about Epping. In particular, Question 5(i) deals with the effect of development on the purpose of Green Belt. TFP will submit a further Hearing Statement on the detailed SEMPA issues by the April deadline.

5.0 ISSUE 5

Is the distribution of development justified in respect of the approach to flood risk; and to protecting water quality

- 5.1 TFP offer no comment on this issue. Allocation EPP.R2 is not impacted by flood risk issues. Site drainage issues have been addressed in detailed site technical studies.

6.0 ISSUE 6

Is the distribution of development justified in respect of its effect upon transport and other infrastructure in the District? Will the plan be effective in securing the infrastructure necessary to support proposed growth?

- 6.1 These questions are largely a strategic transport issue and the responsibility of Essex County Council. TFP await with interest the promised further strategic technical analysis and advice from the County Council, and will provide comment if necessary. In the meantime, TFP are continuing their own transportation studies to ensure that EPP.R2 can be accessed and that appropriate mitigation measures can be put in place. Again, the detail of the SEMPA area will be addressed in TFP's response to Matter 15 Issue 2: Policy P1 Epping where transport sustainability is raised.