

**EPPING FOREST  
DISTRICT LOCAL PLAN  
EXAMINATION**

**MATTER 2: CONTEXT,  
VISION & OBJECTIVES  
AND SUSTAINABLE  
DEVELOPMENT**

**ID: 19LAD0121**

**HEARING STATEMENT**

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## MATTER 2 – CONTEXT, VISION & OBJECTIVES AND SUSTAINABLE DEVELOPMENT

### Introduction

- 1.1 This Matter 2 Statement has been prepared by Carter Jonas LLP on behalf of Pigeon Investment Management Ltd (Pigeon) to respond directly to the Inspector's questions for this Matter. The Statement only responds to the Inspector's Questions which are relevant to Pigeon's interests. Representations were submitted to the Epping Forest District Local Plan 2011-2033 (EFDLP) on behalf of Pigeon (Id. 19LAD0121). Pigeon are promoting land East of Epping for a residential-led mixed use development for around 400 dwellings (or greater)(Site Ref. SR-0153), which is generally consistent with the 2016 draft EFDLP (Regulation 18) which proposed at least 930 homes shared between South (not the Regulation 19 South) and East, but with East having a frontage onto Stewards Green Road included to provide independent access to East Epping and south being land east of the railway line. Pigeon has also promoted a more extensive area of land at East Epping based on Garden Settlement principles, replacing the allocation of 950 homes South of Epping. Alternatively, the land East of Epping site could in full or part supplement the South Epping preferred allocation.
- 1.2 East Epping has been promoted as a site that could deliver a mix of uses providing added benefits for Epping, including: a range of housing typologies including a high proportion of bungalows and self-build plots; a high quality mixed use community hub which could include a local convenience store and doctor's surgery and car parking to serve the local facilities and nearby tube station; a C2 Care Village; Primary School site; potential leisure centre with sports pitch provision; and an Eastern link road between Steward's Green Road and Stonards Hill which would assist in reducing traffic having to travel through the Town Centre.
- 1.3 The context, vision and objectives, and sustainable development related representations relevant to Matter 2 are as follows:
- Paragraph 2.27 – Rep Id. 19LAD0121–7

## MATTER 2: Context, Vision & Objectives and Sustainable Development

### Issue 1: Are the context, vision and objectives for the Plan accurate and comprehensive?

*3. Do the vision and objectives adequately reflect the Plan's aims for air quality, green and blue infrastructure, protection of the landscape and biodiversity, and healthy living? Should specific reference be made to the aim of conserving or enhancing the historic environment, including archaeology?*

- 1.4 It is considered that the vision and objectives in EFDLP do not adequately reflect the aims for air quality, green and blue infrastructure, protection of the landscape and biodiversity, and conservation and enhancement of the historic environment. It is noted that Paragraph 2.26 of EFDLP does refer to other policies that support the vision, and which relate to these particular issues. It is suggested that these matters could be added to the text of some of the existing criteria in the vision, in particular criterion (iii), (v) and (vi) which relate to the character of existing settlements, biodiversity and recreation. The aim related to air quality could potentially be added to criteria (ix) which relates to access by sustainable modes of transport, although pollution is not just about transport and as such air quality probably justifies an additional and separate criteria within the vision.
- 1.5 The representations submitted for Pigeon did not specifically object to the vision or objectives in EFDLP, but it was considered that the vision and objectives will not actually be delivered by the proposed development strategy contained in Policy SP2 and the proposed allocations including at South Epping. In particular it is considered that the following parts of the vision and objectives will not be met:

*Vision Criteria*

- (ii) new homes of an appropriate mix of sizes, types and tenures to meet local needs have been provided and well integrated communities created*
- (iv) development needs will be met in most sustainable locations*
- (ix) access to places by public transport, walking and cycling will be promoted*

*Local Plan Objectives*

- B(i) to make provision for objectively assessed market and affordable housing needs within the District, to the extent that this is compatible with national planning policy*
- D(ii) to improve public transport, walking and cycling opportunities with the aim of promoting healthy lifestyles, reducing the effects of traffic congestion and improving accessibility to services and the countryside without requiring the use of the car.*

- 1.6 As set out in Pigeon's Matter 3 Hearing Statement, it is considered that the housing requirement for Epping Forest District is higher than stated in Policy SP2 of EFDLP and should be increased to a minimum of 13,278 dwellings, and as a result the housing related vision criteria (ii) and objective B(i) will not be met.
- 1.7 It is considered that the decision not to allocate the site promoted by Pigeon, at land East of Epping, means that an opportunity has been missed to direct development to a highly sustainable location on the edge of Epping which is accessible to the facilities within the Epping Town Centre and Epping Station by walking and cycling. The site is less than 5 minutes' walk from the station with the ability to deliver an enhanced footpath link. The site also benefits from good bus service provision and the town centre is also within acceptable walking and cycling distances, representing a genuine opportunity to achieve a modal shift with transport choices alternative to the private car. The proposed 'hub' mix of uses within the land Epping of East site will also promote sustainable travel choices. It is considered that the decision to not allocate land East of Epping for a residential-led mixed use development means that the sustainable development and transport related vision criteria (iv) and (ix) and objectives D(ii) will not be met. In addition, the allocation at South Epping will not meet the above objectives and will be heavily car reliant, because of the distance from the Town Centre and Epping Station as well as the topography which requires a more challenging uphill walk into Epping, which will further discourage the use of more sustainable transport options.
- 1.8 In terms of pollution, the proposed allocation at South Epping is located in close proximity of the M25 and a buffer will be required within the proposed development to address noise and air quality constraints; if these constraints are not taken into account for this site then the suggested additional vision criteria and objectives related to pollution and air quality will not be met. It should be noted that the land East of Epping has no constraints associated with noise or air quality.

