

Home Builders Federation

ID: 19OTH0036

Matter 4

EPHING FOREST LOCAL PLAN EXAMINATION

MATTER 4: The Spatial Strategy/Distribution of Development

Issue 4: Is the distribution of development justified in respect of the need for, and approach to, Green Belt release?

1. Paragraph 14 of the NPPF generally requires that a Local Plan should meet the objectively assessed development needs of the area. However, it also confirms (via footnote 9) that Green Belt is one of the constraints which indicates that development should be restricted. How has this tension been resolved in favour of the conclusion that there are exceptional circumstances to justify the alteration of Green Belt boundaries? In particular:

a. How do the specific development needs of the District weigh against the importance given to Green Belt protection?

We would support the Council's decision to amend Green Belt boundaries. This recognises that the scale of the development needs of the Borough and increasing cost of accommodation was not a sustainable position and one that could only be addressed through the amendment of Green Belt boundaries. In particular the poor affordability and rapidly increasing accommodation costs within Epping Forest attests to the acuteness of the issue with regard to housing supply in the Borough and the limited opportunities for further development within its urban areas. We would also suggest that the circumstances faced by EFDC would support further amendments should the inspector consider the assessment of housing needs to be under estimated as we have suggested in our representations and statement to matter 3.

b. What would be the consequences of not releasing Green Belt land to help meet development needs?

The consequences of not releasing Green Belt land in EFDC will be severe. The current problems seen with regard to affordability will worsen not only in the Borough but across the HMA as those unable to form households in EFDC seeking to move



elsewhere within the HMA. Even at the proposed level of delivery the affordable housing needs arising in EFDC will not be met in full and this situation will be considerably worse without the development opportunities created by the release of land from the Green Belt. Given that there is no land outside of the urban area that is not Green Belt it is vital that boundaries are amended to support development.

c. Have alternatives to Green Belt release been fully considered:

i. Has full use been made of previously developed land? Has a Brownfield Land Register been published and how has it been taken into account?

ii. Has the density of development been maximised, on brownfield and greenfield allocations?

iii. Could vacant homes be brought back into use? Have approximately 1000 properties in the Epping Area been empty for more than 6 months?

iv. Has the potential for windfall development during the Plan period been underestimated?

v. Could any other authority within the HMA have accommodated some of the District's housing need on non-Green Belt land?

Whilst it is important that the Council seeks to ensure that other alternatives have been considered the scale of the need within Epping Forest mean that it is inevitable that Green belt boundaries would need to be amended in order to support delivery. The Council's expectations of what could be delivered in the urban area would appear to be sound and that whilst further opportunities may come forward it is unlikely for these will not be sufficient to offset the allocations resulting from the proposed Green Belt boundary amendments.

2. Are the changes proposed to the Green Belt boundary informed by a robust assessment of the contribution made by individual sites to the purposes of the Green Belt (EB74A-B; and EB705A-B)? How were the findings of the Green Belt Review weighed in the balance with other planning considerations in the site selection process?

No comment

3. Is the scale of Green Belt release proposed at NWB, Thornwood and Waltham Abbey justified and proportionate to the size of the existing built up areas?

No comment

4. How have anomalies in the Green Belt boundary been identified and does the need to correct them amount to the exceptional circumstances necessary to alter the boundaries? Should sites with planning permission for residential development in the Green Belt (such as land north of Ivy Chimneys Road, Epping) be removed from the Green Belt? (See Reps 19LAD0022 re. land north of Ivy Chimneys Road, Epping).

No comment

5. Having regard to paragraph 85 of the NPPF, and to the potential for an increased level of housing need in the District to be identified in the future, how has the Council satisfied itself that Green Belt boundaries will not need to be altered at the end of the Plan period? Is it necessary to identify areas of safeguarded land between the urban area and the Green Belt?

Given the level of housing needs that are likely in future it is inevitable that boundaries will need to be reviewed within five years of this plan being adopted let alone at the end of the plan period. The primary concern of the Council should therefore be to ensure that its assessment of housing need is realistic and in line with the expectations of the standard methodology. So, whilst it is important that the Council can deliver beyond the plan period, we would suggest that there is a more pressing need to identify land to deliver the development needs of this area within this plan period.

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