

**Epping Forest District  
Council  
Examination**

**Hearing Statement  
Matter 4**

**Rachel Bryan  
On Behalf of  
Mr Martin Eldred  
19LAD0034**

**Sworders  
January 2019**



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## 1.0 INTRODUCTION

- 1.1 This hearing statement considers Matter 4 – The Spatial Strategy/Distribution of Development, specifically, Issues 2 and 4.
- 1.2 It is submitted on behalf of Mr Martin Eldred, landowner of sites NWB.R1 and NWB.T1 (19LAD0034).
- 1.3 This Hearing Statement supplements Regulation 19 representations made on behalf of Mr Eldred in January 2018 and considers the Inspector’s Matters, Issues and Questions in relation to Week 2 Matter 4 of the Epping Forest Local Plan Examination
- 1.4 **I confirm I wish to attend the hearing.**

## 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 In response to **Question 4**, the allocation proposed for North Weald Bassett (NWB), including account for development at nearby Thornwood and Hastingwood, is justified and proportionate.
- 2.2 NWB is a Parish, made up of three distinct settlements; North Weald, Thornwood and Hastingwood.
- 2.3 North Weald is a sustainable location for development, offering a good range of facilities and services, including good public transport access. The village benefits from a small parade of shops, including a small Co-Operative store, providing for daily basic shopping requirements, a post office, nursery and primary school, a pharmacy and doctors surgery, along with leisure/sports facilities, a community hall, library and good public transport links to the wider District.
- 2.4 The settlement hierarchy is defined in Chapter 5; Places, in accordance with the Settlement Hierarchy Topic Paper 2015 (EB1007). The settlement hierarchy does not consider the strategic sites around Harlow, of which the proposed development in Hastingwood is a part.



- 2.5 Neither the Local Plan Submission Version (LPSV) nor EB1007 intend for the settlement hierarchy to inform the quantity of development at each category. The purpose of the settlement hierarchy is to identify how existing settlements function and establish a measure of relative sustainability of and between those settlements (EB1007 paragraph 1.8).
- 2.6 The National Planning Policy Framework (NPPF) does not contain a requirement to allocate development in accordance with a hierarchy, or allocate development to larger settlements in favour of smaller settlements. Instead it requires management of growth patterns to make the fullest use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable (paragraph 17). Policy P6 for North Weald includes infrastructure and service provision across both Strategic Masterplan areas to result in a level of services appropriate to the new settlement size and enhance the sustainability of the settlement.
- 2.7 Additional development in accordance with Policy P6 will provide an opportunity to capture planning contributions and increases in land values to invest in local infrastructure and services within North Weald itself, to reduce any current reliance on Harlow or Epping for education and services. In addition, the creation of new households will further support schools, local shops and businesses and the public transport which serve the existing population
- 2.8 The place in the settlement hierarchy is only one of many factors that have been considered in agreeing the distribution of development. Housing has been allocated in accordance with the sequential approach, as set out in paragraph 2.66 of the LPSV, which considers flood risk, the Green Belt etc. Other factors such as the constraints imposed by the SAC and the historic environment etc have also informed the site selection process. For example, Waltham Abbey and Ongar are historic towns, with the NPPF containing policies to protect and enhance the historic environment, as well as Green Belt policy stating one of the purposes as the preservation of historic towns.
- 2.9 It is not appropriate to consider the proposed growth at Thornwood and Hastingwood, when considering the proportionality of the growth proposed at North Weald. EB1007



considers North Weald, Thornwood and Hastingwood separately.

- 2.10 Hastingwood forms part of the growth of Harlow, so whilst being physically within the NWB Parish area, it will form part of Harlow and look to Harlow for services.
- 2.11 Thornwood is also within the NWB Parish area, but also relies primarily on services in Epping and Harlow with no clear functional link with North Weald. Due to severance by the M11 and North Weald Airfield, there is no road link from the village centre at North Weald to Thornwood, without going via Epping or the A414/M11 roundabout, to the south of Harlow. Thornwood scores well for accessibility due to bus links to Epping, Harlow, Ongar, Brentwood, Loughton and Romford.
- 2.12 If the development at Hastingwood and Thornwood were to be considered with the growth at North Weald, then according to the methodology contained in EB1007, the settlement assessment scores informing the settlement hierarchy should also be considered. Adding together the settlement assessment points for North Weald (15), Thornwood (8) and Hastingwood (2) results in a score of 25, which would put the combined settlements in the “Town” category, negating an argument that the allocation is disproportionate.

### **3.0 ISSUE 3: IS THE DISTRIBUTION OF EMPLOYMENT LAND IN THE PLAN JUSTIFIED IN LIGHT OF THE DISTRIBUTION OF HOUSING?**

- 3.1 In response to **Question 1**, sustainability in transport terms means far more than walking, cycling and public transport, although these remain key elements. It is about making most efficient use of the road space available and this means encouraging peak spreading, car sharing, and even working from home.
- 3.2 Whilst the potential employment land may require an extension to bus services, the proximity of potential adjacent residential areas could assist in making these deliverable/sustainable in the long term.
- 3.3 Furthermore, delivering major employment in North Weald could significantly reduce the amount of ‘out-commuting’ from the area by providing local jobs and the



corresponding amount of mileage within the local and strategic road network.

#### **4.0 ISSUE 4: IS THE DISTRIBUTION OF DEVELOPMENT JUSTIFIED IN RESPECT OF THE NEED FOR, AND APPROACH TO, GREEN BELT RELEASE?**

- 4.1 In response to **Question 1**, we support the Council's approach.
- 4.2 As set out in the Background Paper on Green Belt and District Open Land (EB1608), exceptional circumstances do exist and Green Belt release is justified in order to facilitate wider strategic development goals in the Housing Market Area. This judgement has been reached in the context of the specific circumstances relating to the District, a stringent and thorough process to minimise development outside of the Green Belt and a balance between protecting areas of high performing Green Belt land where possible, but also taking into account matters of sustainability, protection of the environment and landscape, supporting regeneration and the delivery of the required growth.
- 4.3 Green Belt release is required in order to promote sustainable patterns of development to meet objectively assessed needs for development in the District over the Plan period; it is simply the only option remaining to meet the District's contribution to the objectively assessed development needs of the Housing Market Area (HMA). Failing to meet those needs would not contribute to the achievement of sustainable development in accordance with national planning policy.
- 4.4 Having demonstrated these exceptional circumstances, the preparation of this Local Plan is the appropriate mechanism to make these amendments, in accordance with national policy.
- 4.5 Policy SP2 sets out an appropriate development strategy which seeks to minimise the loss of the Green Belt through first allocating sites within existing settlements and focussing development in the most sustainable locations. However, as set out above, release of land for the Green Belt is necessary to meet objectively assessed housing need, and the release of sites has been comprehensively informed through Green Belt



Assessments, and Site Selection Reports, with full consideration given to all other reasonable alternatives.

- 4.6 In response to **Question 2**, we support the overall approach taken by the Council regarding Green Belt release and consider this to be robust.
- 4.7 Specifically in relation to sites NWB.R1 and NWB.T1, the Green Belt Assessment 2016 (EB705A) includes these sites parcel 010.1. The conclusion for this parcel is that the level of harm caused by release of the parcel to be “low” in the context of purposes 1, 2, 3 and 4 and “none” with the exclusion of purpose 3. In the context of North Weald, it was found to be the most suitable site for development, from a Green Belt perspective.
- 4.8 We consider this assessment to be robust and justifies the release of this parcel from the Green Belt to accommodate a portion of the development need of the District.
- 4.9 This evidence justifies the release of the entire parcel 010.1, but only a portion of it has been proposed for release. Therefore we question the extent to which individual sites have been assessed and whether there are instances where new Green Belt boundaries have not been drawn in the most suitable and defensible location, in accordance with NPPF paragraph 85 and anomalies have arisen.
- 4.10 The northern boundary of site NWB.R1 within the NWB Strategic Masterplan Area is proposed to be defined by the A414, however, this will leave land in the Green Belt that it is not necessary to keep open and likely to come under pressure for alteration.
- 4.11 It will create an anomaly of a narrow strip of land between two areas of inset settlement comprising the NWB Masterplan Area and existing main body of North Weald to the south of the A414 and the post-war development to the north.
- 4.12 Given the existence of built development along Vicarage Lane East and Weald Bridge Road, plus the employment allocation EMP.E1, it would be logical to include this strip of land within site NWB.R1 as it would serve none of the purposes of the Green Belt as set out in the NPPF (paragraph 80).
- 4.13 On the basis that EB705A includes this strip within the same parcel 010.1 as site NWB.R1



meaning the evidence base reaches the same conclusion for land to the north and south of the A414.

- 4.14 Therefore, the evidence base for release of this stirp therefore already exists, and a robust assessment of individual sites within parcel 010.1 would demonstrate that release of Green Belt between the A414 and Vicarage Lane East alongside the NWB Masterplan Area would result in a more defensible Green Belt boundary.
- 4.15 EB0608 does refer to ‘future’ anomalies that would arise due to the alterations to the Green Belt through site allocations. However, this document seeks to explain where anomalies have been identified for release and does not demonstrate that other anomalies have been considered.
- 4.16 In response to **Question 3**, we consider that the scale of Green Belt release proposed at NWB, Thornwood and Waltham Abbey is justified and proportionate.
- 4.17 In accordance with NPPF paragraph 84, Green Belt boundaries should be defined to take account of sustainable patterns of development to meet the District’s contribution to the objectively assessed development needs of the Housing HMA. For the reasons set out in response to Issue 2, question 4, North Weald is a sustainable and suitable location for the scale of development proposed; the scale of Green Belt release is necessary in order to deliver the scale of development proposed and is therefore justified and proportionate.

## 5.0 SUMMARY

- 5.1 This hearing statement is submitted on behalf of Mr Martin Eldred, who supports the Council’s approach to the distribution of development, including the allocation of site NWB.R1 and its release from the Green Belt. Specifically;
- The scale of the allocation proposed for North Weald Bassett (NWB) is proportionate and justified by the evidence base.
  - The Council’s approach to Green Belt release is justified, as supported by a



robust assessment of the contribution of individual parcels to the Green Belt and a balance of other planning consideration, including supporting patterns of sustainable development.

- A more forensic assessment of individual sites may have yielded a more defensible Green Belt boundary in the context of NWB.R1.
- The scale of Green Belt release is justified and proportionate as it is necessary in order to deliver the District's contribution to the development needs of the HMA.