

EFDC: Local Plan Examination

Hearing Statement

**Matter 16: Development Management
Policies**

Tuesday 26th March 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

Are the Development Management Policies in the Plan justified, effective and consistent with national policy in respect of the specific matters set out below? Are there any other issues concerning their soundness?

Policy DM2: Epping Forest SAC and the Lee Valley SPA

3. *Will Policy DM1 and DM2 taken together provide adequate protection for the whole of Epping Forest, including parts outside the SAC? In seeking to protect the Forest via two separate policies, is there a risk that the approach could become disjointed?*

- 1.1 Policy DM1 deals with the more general aspects of Habitat Protection and Improving Biodiversity, with DM2 dealing specifically with the Epping Forest SAC and the Lee Valley SPA. This seems to provide a robust approach to complex and interrelated issues with limited risk of the two policies becoming a disjointed.
- 1.2 TFP acknowledges the requirement for development to assist in the conservation and enhancement of the Epping Forest Special Area for Conservation (SAC). TFP is willing to consider appropriate and justified financial contributions to access management in line with draft Policy DM2. This approach is now provided in more detail in the EFDC document Interim Approach to Managing Recreational Pressures on the Epping Forest Special Area of Conservation considered by EFDC Cabinet on 18.01.18.
- 1.3 However, TFP remains concerned that there is insufficient clarity in the policy wording regarding the provision of a meaningful proportion of natural green space, or access to natural green space or the requirement for financial contributions. A consistent approach to this matter is required to be applied to all relevant development allocations across the District. The detailed master planning exercise that is underway for South Epping will determine the level of Suitable Alternative Green Space (SANGs) that can appropriately be provided and the level of financial contribution that may be required.

Policy DM5: Green and Blue Infrastructure

- 1.4 TFP object to the wording at criterion B(i) regarding the retention and protection of trees. A more pragmatic approach is required to ensure that development can sensibly take place without undue restriction. This policy should be amended to be consistent with Policy DM1 (F) which pragmatically notes that tree loss will only be permitted where the need for and benefit of development can be demonstrated to clearly outweigh loss. This change will provide a robust policy framework.

Policy DM20: Low Carbon and Renewable Energy

42 Is Part D, which requires Strategic Masterplans to demonstrate how infrastructure for district heating could be incorporated, justified by reference to viability? For example, it has been suggested that a development of 950 dwellings such as proposed at South Epping would be too small to viably deliver a district heating scheme?

- 1.5 TFP object to the requirement, set out at Clause D, for Strategic Masterplans to demonstrate how the potential to incorporate infrastructure for district heating can be provided as insufficiently clear. A development of 950 dwellings would be far too small to deliver this type of infrastructure. Such schemes rely upon much larger and more dense forms of development and generally rely upon substantial public subsidy.
- 1.6 In any event district heating is not well-suited to *conventional* residential densities in the range that will be applicable to the SEMPA. Substantial alternative land uses are needed to provide a balanced demand for the heat load and developers are generally dependent on utility providers to operate and deliver such systems. In our view it is far more robust to incorporate a form of energy hierarchy that might:
- seek to reduce energy use by the employing sustainable design and construction measures;
 - supplying energy efficiently and prioritising decentralised supply; and
 - utilising renewable energy.

- 1.7 In addition, the SEMPA is dissected by the London Underground Line which would impose considerable challenges on construction and distribution technologies. In our view this is an outdated approach to Low Carbon and Renewable energy strategy. The ability to deliver a single district heating scheme for EPP.R1 and EPP.R2 is highly unlikely.