

Epping Forest District Council: Examination of the Local Plan, 2011-2033

Pre-Hearing Statement – Response to Inspectors Matters, Issues and Questions

MATTER 15: Places and Sites (Policies P1-P15)

Issue 2: Are the Plan's policies for the specific places and sites within the District justified, effective and consistent with national policy; and are the specific site allocations they include justified and deliverable?

Policy P1: Epping

1. Introduction

- 1.1 These representations have been prepared by Kember Loudon Williams on behalf of Croudace Strategic, the owner of Land at Stonards Hill, Epping. The land was previously referred to by the Council as being incorporated within the following land parcels: EPP-B, SR-046ii, DSR 049 & 049.1. This site is identified below in red (Figure 1) and is situated to the north east of the town.
- 1.2 Croudace Strategic have promoted the site for housing through the Local Plan process and have previously provided representations in respect of the site. The representations to date have been supported by technical reports on Landscape, Highways and Ecology that demonstrate the site's suitability for housing. Notwithstanding this work, this site did not proceed beyond Stage 3 of the Local Plan site selection process, which formed part of the ARUP Site Selection Report 2018.

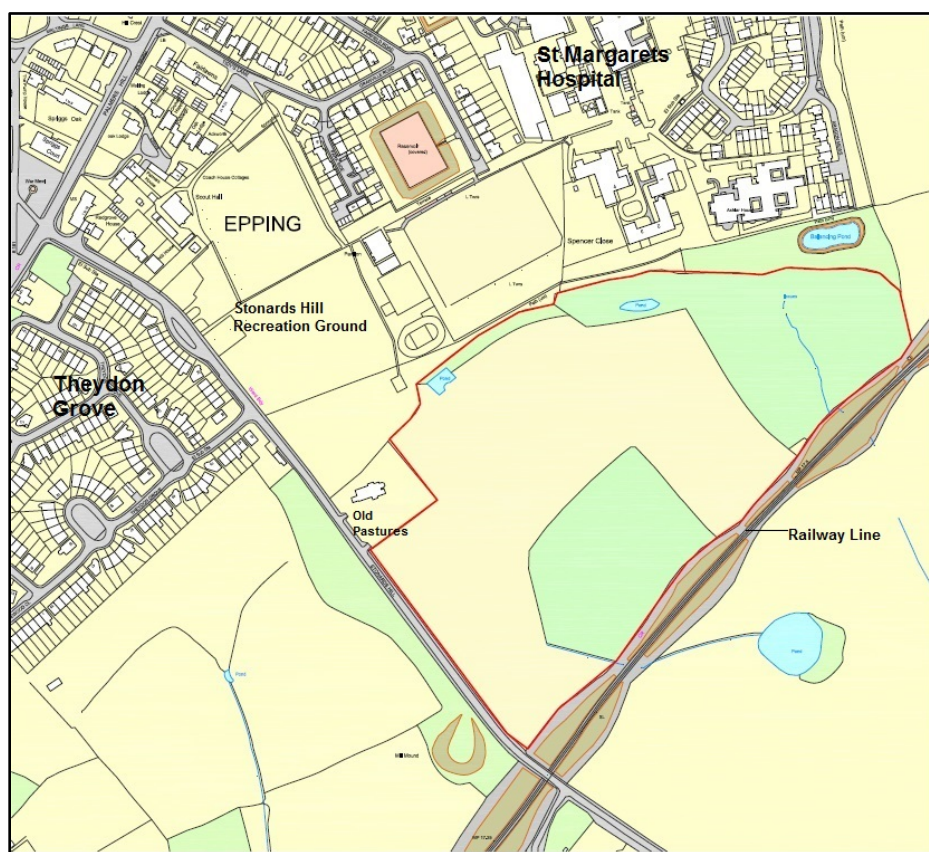


Figure 1: Land at Stonards Hill outlined in red.

- 1.3 These representations focus on the Inspector's Examination of Epping Forest District Council's (EFDC) Local Plan, in particular Matter 15, Issue 2.5 (South Epping Masterplan Area) of the Inspector's Matters Issues and Questions (MIQs) document, dated November 2018. These submissions respond to the Inspector's questions under parts 5a), 5c) and 5i. of Issue 2, Matter 15, below in turn.

2. Matter 15, Issue 2, Part 5, EPP.R1 & R2 (South Epping Masterplan Area):

Is this allocation justified in respect of the following matters:

- a) Is the area a sustainable location for significant expansion considering its relationship to the existing town centre, particularly in respect of distance and topography? &
- c) what effect will the development have upon the vitality and viability of the existing town centre?

2.1 We submit that the proposed allocation: EPP.R1 and EPP.R2 South Epping Masterplan Area, is not justified and is unsuitable due to having a poor relationship with the existing town centre, unlike other closer and more sustainable sites close to the town centre, such as Land at Stonards Hill.

2.2 The below context plan shows the site allocations proposed for Epping, including the south Epping Masterplan Area (EPP.R1 & EPP.R2). The location of land at Stonards Hill is highlighted by a purple star. As can be seen, Land at Stonards Hill is much closer to the town centre “core”, which is within 500m from the site; but the masterplan area is around double the distance, circa 1000m, at its nearest point (as the crow flies).

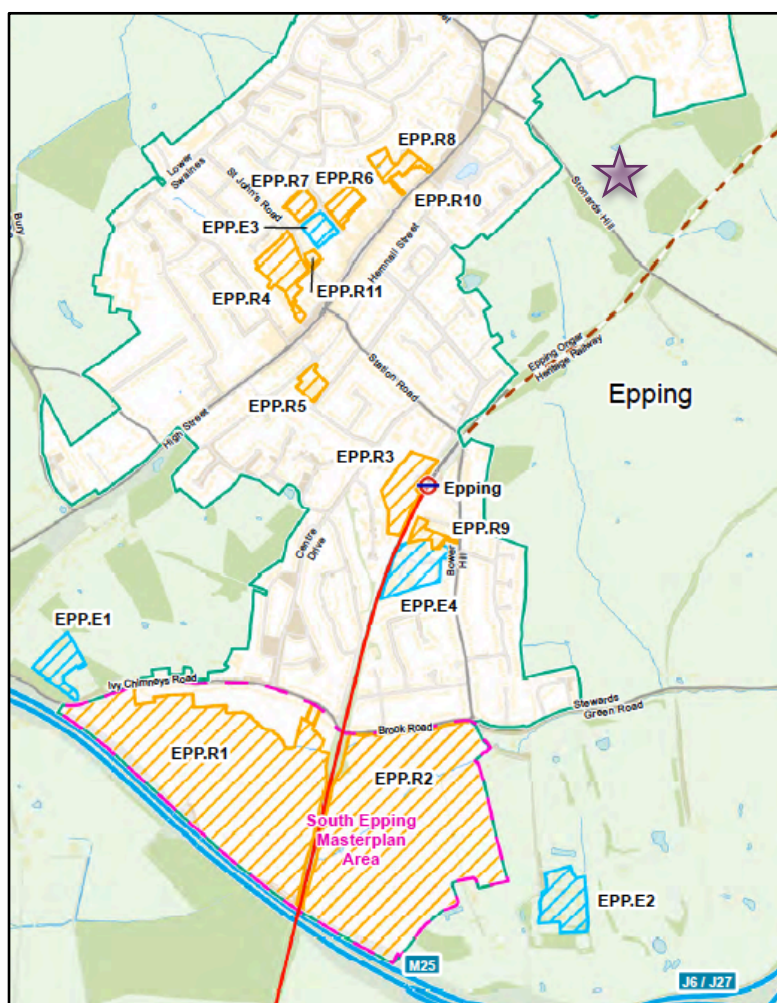


Figure 2: Map taken from EFDC Local Plan Submission Version 2017 showing Site Allocations in Epping

- 2.3 Proposed Policy P1 suggests a significant level of infrastructure is required to support the proposed housing allocation to the south of Epping, within areas EPP-R1 and R2, akin to the provision of a new neighbourhood centre. We are concerned that the creation of additional retail and employment uses within the southern extension could in fact lead to competition with the existing town centre. This competition comes at a time when town centres are demonstrably 'struggling for survival' due to increased competition from the internet and political economic uncertainties. The competition of facilities and services would draw 'spend' and footfall away from the town centre to the detriment of its vitality and viability. There is a real possibility that the attraction and vitality of the town centre could be damaged through the creation of a smaller sub-centre.
- 2.4 EFDC instructed Arup to carry out a Town Centres Review in 2016 where in section 3.4 they highlighted the need for the Council to be *"mindful of the potential for damaging the health of centre through the overprovision of new floorspace notionally justified on the grounds of additional housing/population growth, which could undermine the competitive position of existing traders faced with an already difficult trading environment"*.
- 2.5 The creation of additional retail and employment provision to the south of Epping will result in the displacement and duplication of services, which in turn could negatively affect the health and future success of the existing town centre. The strategic expansion option for the south of Epping is not, in our view, the right solution. The development of the south of Epping masterplan site will result in the creation of a smaller sub-centre with new facilities and services being required, rather than focusing new housing development on smaller sites in and around the town centre, which already have good accessibility to existing services and facilities, such as Land at Stonards Hill. With the vagaries of the retail employment markets, the sustainable consolidation of existing facilities must live at the heart of the Council's strategy. By locating the vast majority of development to the south of Epping, this option fails to do that.
- 2.6 Future investment into existing services, such as the Princess Margaret Hospital and the Limes Medical Centre, to the north of the town centre, is crucial for the District's growing population and there is a risk that investment into existing services would be reduced if there are no local site allocations close to these facilities.
- 2.7 As mentioned in previous representations, Land at Stonards Hill is a sustainable location for new housing. It has strong and intermediate links to public transport and is within walking distances from key facilities (within 800m -1200m), which is shown on the below map (Figure 3).
- 2.8 With regards previous promotion work in relation to Land at Stonards Hill, Landscape, Ecology and Highways Assessments have all been undertaken which support the potential for the site to be developed for housing. Land at Stonards Hill is well defined and contained visually by the existing railway line to the east and previous representations have continued to maintain that any reservations EFDC raised during the site selection process with regards landscape sensitivities, impact on the Green Belt and setting of the historic environment can be overcome through appropriate design. It should be noted again, that previous queries regarding the loss of trees and woodland are unfounded as Croudace have always maintained they would be protected and moreover any development will include contributions to, and appropriate integration with the existing recreation ground and community facilities which adjoin the site to the north.

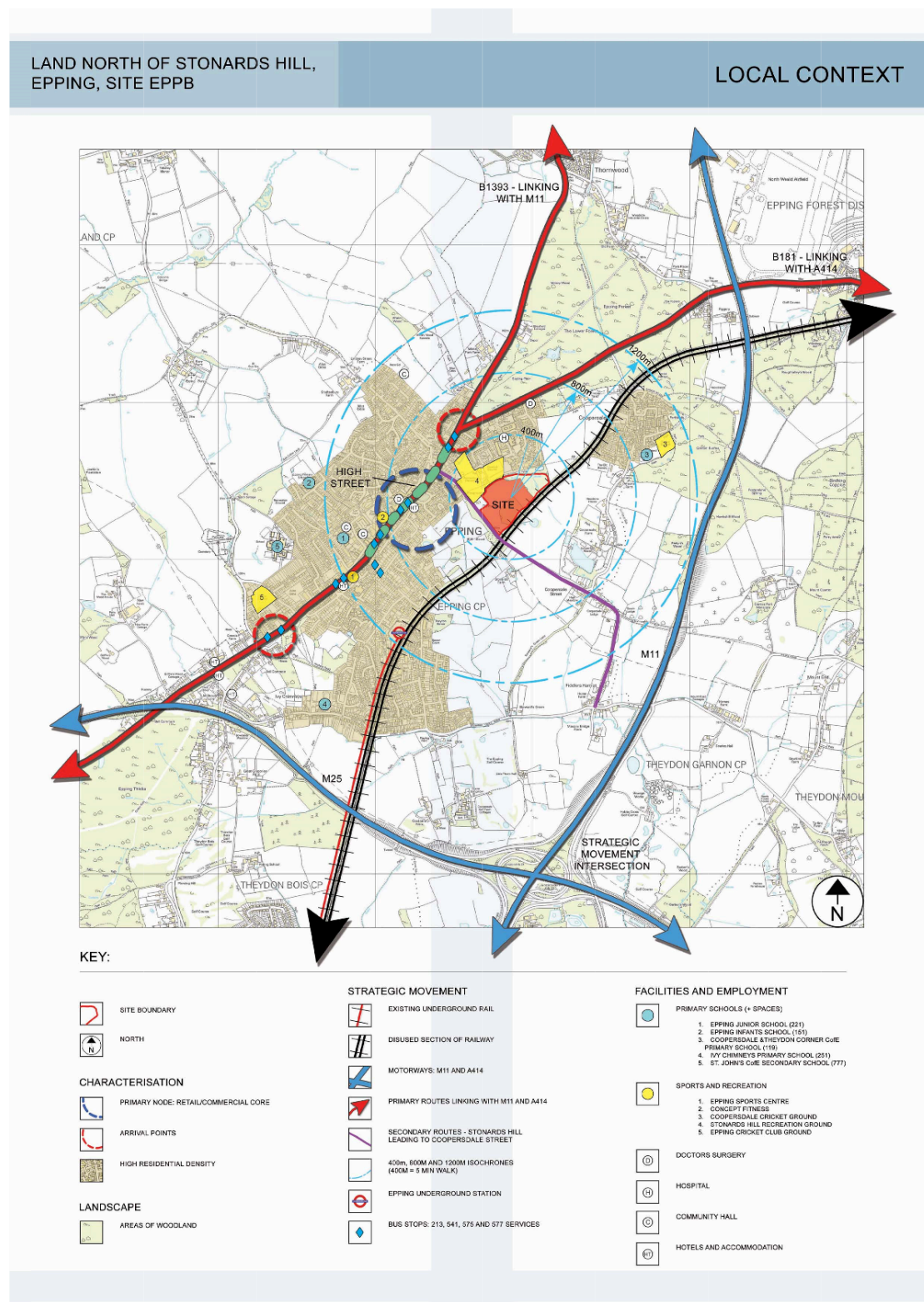


Figure 3 – Context Plan taken from K LW 2013 Representations for Land at Stonards Hill, Epping

- 2.9 The allocation of the Masterplan area to the south of Epping appears to be closely related to its proximity to Epping tube station – which is referred to in the ARUP Site Selection Report (Appendix B1.5.2). Whilst important in terms of future population having good access to public transport, this is only part of a bigger set of issues - it should not outweigh other considerations. The promotion of local employment and local distinctiveness is crucial to realising Epping's vision, which is: *"... to continue to thrive as one of the main centres in the District, providing excellent community services, facilities and transport connectivity..."* (p.115 of EFDC Local Plan Submission Version 2017). The town needs to retain a strong employment base by supporting start up business and local enterprises and attracting new people to live and work in the same area will boost the local economy, instead of promoting out-migration travel to London to work and support the wider London economy.
- 2.10 It appears the overriding reason for taking the southern masterplan area forward to a proposed strategic site allocation was due to it being the "least sensitive to change" in landscape terms than any of the other strategic growth options. Area 4, which includes the southern masterplan area, was found to have low sensitivity to change in landscape terms in the EFDC Settlement Edge Landscape Sensitivity Study (SELSS) (2012). However, when we consider the results, Area 4 scored a "moderate" rating to overall visual sensitivity due to the land being visible in longer distance views in the countryside due to its topography. Given the "moderate" scoring for one half of the assessment, it seems odd that the overall sensitivity to change score is "low" rather than "moderate". This is inconsistent in our view and should be reconsidered.
- 2.11 Conversely Area 3, which includes Land at Stonards Hill, was decided to have "high sensitivity" to landscape change. This conclusion has been questioned and shown to be incorrect in our previous representations, and the Preliminary Landscape and Visual Assessment (2013) by David Huskisson Associates (PLVA). The PLVA considers the findings of EFDC SELSS is too broad brush, and in paragraph 6.6, it states: *"it is possible that within the areas considered that discreet pockets with different characteristics may be found where, on more detailed examination , development may be found to be acceptable"*. In paragraph 6.17 the PLVA goes on to say that *"should the site be developed in the form set out in general terms in this report, it is considered that the landscape and visual changes would be likely to be minor and not of other than only very localised significance"*.
- 2.12 Notwithstanding the findings of the EFDC SELSS, the assumed "low" landscape impact of Area 4, which includes EPP.R1 & R2, allocations under proposed policy P1, should not in itself be the only pre-cursor for taking the site further. Arguably more important are the effects on the purposes of the Green Belt following the release of land for development, discussed in Section 3.

3. Matter 15, Issue 2, Part 5, EPP.R1 & R2 (South Epping Masterplan Area):

Is this allocation justified in respect of the following matters:

- l) What effect would the development of this area have on the purposes of the Green Belt.

3.1 We submit that the development of EPP.R1 & EPP.R2 would have significantly harmful effects on the purposes of the Green Belt, in accordance with the findings provided in the LUC Green Belt Review, Stage 2 (2016).

3.2 The LUC Green Belt Review, Stage 2 (2016) refers to the proposed South Epping Masterplan area sites (EPP.R1 & R2) as:

- 044.2 (land south west of Epping) as belonging to the EPP.R1 land parcel; and
- sites 045.1 (land south east of Epping, Land south of Brook Road) and 045.2 (also land south east of Epping, Land south of Brook Road) make up EPP.R2.

These sites, are identified in the below map extract, taken from the Green Belt Review Stage 2 (2016).



Figure 3 – Map including sites: 0.49.1, 045.1, 045,2 & 044.2 (taken from LUC Stage 2 Green Belt Review 2016)

- 3.3 The proposed allocation of the south Epping sites (EPP.R1 & R2), contradict and undermine the findings of the LUC Stage 2 Green Belt Review 2016. This review clearly establishes that the release of these Green Belt sites for development would result in the highest level of harm (“very high”) when assessed against the four main Green Belt purposes – “to check the unrestricted sprawl of large built up areas”; “to prevent neighbouring towns from merging together”; “to assist in safeguarding the countryside from encroachment”; and “to preserve the special character of historic towns”.
- 3.4 Figure 4 below, formed part of KLR’s representations made to EFDC in January 2018, and compares the assessment findings of the LUC Stage 2 Green Belt Review (2016) (according to the four identified purposes of the Green Belt), between Land at Stonards Hill to the east of Epping (site reference 049.1), and the three South Epping Sites (044.2, 045.1 and 045.2).

Green Belt Purposes	Parcel’s Contribution to the Purposes of Green Belt			
	Stonards Hill	South Epping Sites		
	Site 049.1	Site 044.2	Site 045.1	Site 045.2
1st Green Belt Purpose (Check the unrestricted sprawl of large built up areas)	No Contribution	No Contribution	No Contribution	No Contribution
2nd Green Belt Purpose (Prevent neighbouring towns from merging into one another)	Relatively Weak	Moderate	Relatively Weak	Moderate
3rd Green Belt Purpose (Assist in safeguarding the countryside from encroachment)	Relatively Strong	Strong	Strong	Strong
4th Green Belt Purpose (To preserve the special character of historic towns)	Moderate	Relatively Strong	Relatively Weak	Relatively Strong
Summary of Resultant Harm	High	Very High	Very High	Very High

Figure 4: Comparison of Green Belt Sites table

- 3.5 As can be seen above, conclusions are correctly drawn in our view that each of the three southern Epping sites would result in “very high” resultant harm to the purposes of the Green Belt if released for housing. The release of Land at Stonards Hill for housing would be less significant in terms of resultant Green Belt harm than the southern Epping sites.
- 3.6 Sites 044.2 (south west of Epping) and 045.2 (south east of Epping, south of Brook Road) make a greater contribution to purposes 2 (merging of neighbouring towns) and 4 (preserving the special character of historic towns) of the Green Belt than Land at Stonards Hill (049.1). In addition, all three southern sites contribute more in terms of purpose 3 (safeguarding the countryside from encroachment) than Land at Stonards Hill (site 049.1). In summary the “southern sites” score higher in terms of harm to the Green Belt for the following reasons:
- All sites lie closer to a neighbouring “town”, Theydon Bois, than Land at Stonards Hill (049.1) to North Weald Bassett. It should be noted that importantly, Theydon Bois is only very slightly separated from another “town” Loughton, which forms part of the London urban area;
 - topography in each site, meaning they are visible from the wider countryside and are felt to safeguard the countryside from encroachment from Epping; and
 - due to the close proximity to the historic core and Conservation Area to Epping, they were felt to contribute more to the historic setting of Epping than Land at Stonards Hill.
- 3.7 Appendix B1.5.2 of the ARUP Site Selection Report 2018, discusses the findings of the LUC Stage 2 Green Belt Review (2016) in relation to the southern sites. ARUP inaccurately conclude that one of the southern sites 045.1(south-east of Epping and south of Brook Road) was *“considered to have low impact on the Green Belt if released”*. This is wholly incorrect as the overall conclusion in the LUC Stage 2 Green Belt Review 2016, as detailed in figure 4, was that the overall resultant harm to all Green Belt purposes would be “very high” if the site was released for housing.
- 3.8 Furthermore, in justifying the strategic South Epping growth option in Appendix B1.5.2, of the Site Selection Report 2018, ARUP consider the sensitivity of the southern sites as *“varied”*, due to the aforementioned inaccuracy and by focusing solely on the 4th Green Belt Purpose – Preserving the Setting and Special Character of the Historic Town of Epping. If the exercise were to focus solely on purpose 4, then it should be recognised that Land at Stonards Hill scores much better than the South Epping sites, as it results in “moderate” harm rather than “relatively strong” harm in the main.
- 3.9 ARUP imply that although two of the southern sites (044.2 & 045.2) scored “relatively strongly” against purpose 4 (Preserving the Setting and Special Character of the Historic Town of Epping), due to the Council’s assessment in respect of this purpose being applied inconsistently at settlement level, less weight should be attributed to the results for purpose 4. In this regard, Appendix B1.5.2 of the Site Selection Report 2018 quotes with regards the southern expansion of Epping: *“while the Green Belt Review Stage 2 (2016) concluded that both of these score relatively strongly against Purpose 4, preserving the setting and special character of the historic town of Epping, further analysis by the Council indicates that the Purpose 4 assessment has been applied inconsistently when considered at the settlement level”*.
- 3.10 It is unclear how ARUP have arrived at this conclusion, given the lack of further justification noted elsewhere and importantly due to the LUC Stage 2 Green Belt Review (2016) still being referenced as a current evidence document without any further updates after 2016. If EFDC

concede that their Green Belt assessment process was applied inconsistently at settlement level, this would surely would have led to a reassessment or a Stage 3 Green Belt Review being undertaken?

- 3.11 It is concluded therefore, that ARUP's justification for pursuing the south of Epping as a legitimate growth option is flawed, and more importantly the Council is deficient for supporting ARUP's conclusions. This again raises fundamental inconsistencies between the findings of the Stage 2 Green Belt Review 2016 and the proposed policy allocation P1 of EFDC Local Plan Submission Version 2017.
- 3.12 As we have maintained in past representations, these inconsistencies cast considerable doubt on the suitability of south of Epping as a strategic growth option in Green Belt terms, particularly when there are alternative, and demonstrably less sensitive sites that are sustainable and deliverable in the Plan period. Stage 2 of the Green Belt Review 2016 deemed the release of the Land at Stonards Hill site (049.1) as being "less sensitive" than releasing the South Epping Sites (044.2, 045.1 & 045.2), and is worthy of further consideration.
- 3.13 On the basis of the above analysis and previous representations, it is essential now that the District Council explain precisely why its current "preferred strategic growth solution", which proposes to release Green Belt land to the south of the town, directly undermines the findings of its own Green Belt Review (LUC Stage 2 Green Belt Review 2016). As things stand, the strategy is inconsistent and contrary to paragraph 35 of the National Planning Policy Framework (NPPF) which requires that for a Local Plan to be found sound it must be justified, based on "proportionate evidence".