

EPPING FOREST DISTRICT LOCAL PLAN 2011 – 2033
STATEMENT TO THE EXAMINATION
ON BEHALF OF WATES DEVELOPMENTS [19LAD0042]

MATTER 15: PLACES AND SITES
POLICY P1 EPPING

1. This statement deals with the specific matters raised in the Inspector's MIQs, with a focus on South Epping Masterplan Area (EPP.R1 and EPP.R2). In our submission these allocations are not sound. However, prior to commenting specifically on the MIQs we would make the following comments.

Changes in the strategy for Epping between Reg. 18 and Reg. 19

2. As the Inspector is aware, the spatial strategy for Epping town was fundamentally altered between Regulation 18 and Regulation 19 stages of the Plan. At Regulation 18, the plan identified a total of 16 housing allocations amounting to 1,633 units. What became 'South Epping Masterplan Area' (SEMPA) was identified as five separate land parcels (reflecting the disparate ownership and separate promotion of the sites) with an allocation of 625 units¹. In the Submission Draft Plan these five areas of land have been combined into two allocations, and the area enlarged to include the land to the south of SR-0113 (identified as SR-0113A) with the yield increased to 950 units.
3. At the same time, four urban extensions including our client's land at Stonards Hill (SR-0071) were all deleted from the plan, amounting to a reduction of 558 units. Aside from South Epping, the allocations now are nearly all complex sites with existing uses, including the Sports Centre, library, town centre car parks, the station car park, the Civic Centre site, and the St John's site which has had a development brief since 2009. Even by the Council's most optimistic trajectory (EB410B) the Plan does not allocate any sites that deliver before 2021/22, and during that year only 45 units are delivered. The Epping South sites are assumed to commence delivery in 2023/24. Given land ownership complexities and the need for a single masterplan, we very much doubt that this is achievable.
4. As discussed under Matter 6, the Council's housing trajectory now plans for a continued under-supply of housing, adopting a 'stepped trajectory' such that the persistent undersupply is only rectified many years into the future. The changes in the strategy for Epping have contributed to the failure of the Plan to provide for the necessary step-change in housing delivery in the early years of the Plan period by concentrating on a single large site (South Epping) and smaller complex sites. This contrasts with our client's land at Stonards Hill which is immediately available and could yield 120 units in the first five years of the plan.
5. As already discussed at the Examination, the justification for the changes to the Regulation 19 plan set out in the SSA including the deletion of our client's land was that additional

¹ Site references SR-0113B, SR-0069, SR-0069/33, SR-0333Bi and SR-0445

development at Epping South 'better aligned with the Neighbourhood Plan'. Yet the Neighbourhood Plan had not even been published at that time, let alone been made. Moreover, Green Belt release is a strategic issue which under the NPPF(2012) should be decided through the Local Plan not the NP. The Inspector will further recall that under questioning, the Council's response as to why sites (including our client's land) had been removed post Reg.18 was that it was 'in response to public consultation'. However, no evidence has been presented on this.

6. In short, through the Examination it has been shown that the changes to the strategy for Epping town were not supported by the evidence base (Green Belt assessment and the Site Selection Process) or by the Sustainability Appraisal.

Reliance on South Epping Masterplan Area

7. Moreover, the reliance placed on South Epping (EPP.R1 and R2) is not justified by any evidence in order to accord with the test at footnote 12 of the NPPF which advises that to be developable "*sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.*"
8. We await to see whether the Council and/or promoters bring forward such material as they can at this stage to justify development of the SEMPA. In any event, to do so in response to MIQs is entirely unacceptable. Technical work, evidence of development agreements between landowners, evidence of access being resolved and at least an initial masterplan to show how 950 units can be delivered should have been published in advance of the examination as part of the Council's evidence base, given the importance of this site in the Council's housing trajectory. The fact that there is not even a preliminary masterplan renders the Plan unsound as it has not been justified.
9. Appendix 1 provides a summary of landownership issues. There are 10 landowners across the SEMPA (if one includes LUL and Highways England – the allocation includes their land).
10. A Collaboration Letter on The Fairfield Partnership's letterhead only appears to have been signed by The Fairfield Partnership, despite lines being left for the signatures of Mr Padfield and Mr & Mrs Annetts. The letter simply states that the landowners will "work collaboratively to bring forward development in a comprehensive and co-ordinated manner to ensure the timely provision of necessary common infrastructure, and to bring about the early and sustainable developments of the land." A Landowner Memo of Understanding, including a Landownership Plan, was submitted as part of the Padfield Regulation 19 Local Plan representations, but it was only signed by Mr and Mrs Padfield and Jenna Properties despite lines being left for the signatures of The Fairfield Partnership, Mr Annetts and Ms Hillan. This Agreement states that 'if all the parcels are allocated in the Adopted Local Plan the intention is to maintain a close liaison between us to facilitate early and sustainable development of the land'.
11. These arrangements, even if they had been signed, fall far short of evidence of the sort of development agreements that will be needed to create a comprehensive masterplan as envisaged by the policy; equalisation arrangements with regard to such matters as the

location of open space, the school and other the funding of common infrastructure will be essential.

12. Moreover, there is no evidence that agreements to achieve access and the necessary off-site highways improvements to deliver the scheme are in place. Noticeably, the representations from the Fairfield Partnership (TFP) state that

“The Owners note that improvements to off-site highways may require third party land controlled by the City of London (as Conservators of Epping Forest). TFP expect that in such situations, Epping Forest District Council and Essex County Council will take the lead on negotiating any such required improvements with the Conservators.”

13. It is perhaps understandable that the Reg. 19 responses of TFP object to a strategic masterplan being adopted prior to planning applications being brought forward as this would need to be prepared by all landowners jointly. Equally understandable is their objection to any imposed phasing between the two parts of the SEMPA.
14. There is no evidence that the unit numbers can be achieved as no proper constraints analysis and no initial masterplan of any kind has been presented to date. The only drawing of any kind is a ‘Landscape Opportunities and Constraints Drawing’ in the document by BMD in their report *“Landscape and Green Belt Appraisal”* which deals only with EPP.R2 and was submitted as part of TFP’s Reg 19 representations. Whilst this plan is clearly only conceptual it shows development areas amount to only 11ha. on which to achieve 500 dwellings (a density of 45 d.p.h if one ignores all other uses required by the policy).
15. In the absence of such evidence, we have had no option but to undertake our own analysis, attached as Appendix 2. This considers the following key constraints across the SEMPA:-
- Overhead power lines;
 - Noise from M25;
 - Impact on air quality from M25;
 - BPA oil pipeline ((6% of site area of EPP.R1 and EPP.R2 according to Regulation 19 Local Plan Appendix B1.4.2 Assessment);
 - Railway line and embankment;
 - Grade II listed buildings; Gardners Farm and Farm Buildings (Site EPP R.2);
 - Drainage and areas of surface water flooding.
16. The masterplan site area of 48.92ha in Appendix 6 of the Regulation 19 Local Plan includes the M25 embankment (owned by Highways England), existing dwellings along Bridge Hill and Ivy Chimneys Road and the railway line and embankment.
17. Excluding these parts of the site, a more realistic area for the SEMPA allocation would be 41.77ha, as shown on drawing 4580/201 Rev C attached. Taking into account all of the site constraints, we have estimated an indicative gross development area of circa 20ha.
18. Once land for the required primary school (3ha assuming a 3FE school with the re-location of the existing 1.5FE Ivy Chimneys Primary School), a neighbourhood centre (2ha) to include community facilities, employment and retail uses and also a new health hub (1ha)

to include an integrated GP surgery, pharmacy and other medical services has been taken into account, only 13.94ha of residential land would be available for development. At 33dpha, which is the assumed density used in Appendix 6, the number of dwellings that would be delivered on EPP.R1 and EPP.R2 would only be 460, and not the required 950. In order to deliver the required 950 dwellings on the site, a density of approximately 68dpha across the whole site would be needed.

19. This capacity assessment excludes any on-site SANGS and we note the significant objection of the Conservators given the proximity of the site to Epping Forest. It is likely that some SANGS at SEMPA will need to be located outside the constrained undevelopable land under the electricity pylons, and outside the M25 noise buffer zone. This is because open space with the M25 clearly visible and audible, and under electricity pylons would not be an attractive alternative to draw recreational users away from Epping Forest. As such, the developable area of SEMPA could well reduce further.
20. In short, there is no evidence that the SEMPA area can accommodate 950 units.

Inspectors questions

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? How will additional traffic be managed if it is necessary for new residents to use a car?

21. The SEMPA is not in a sustainable location. Attached plan 4580/203 shows the location of the two allocations compared to our client's at Stonards Hill in relation to the underground station, town centre, schools and other day-to-day facilities. At the very nearest, walking distances to the middle of the town centre are around 20 minutes with the route to the town centre being uphill and unlikely to be attractive to pedestrians. The railway station is approximately 1,100m (13 minutes' walk) from EPP.R1 and 650m (10 minutes) from EPP.R2; again the walking routes are uphill on the way to the station.
22. Plan 4580/203 shows that Stonards Hill is in a far more sustainable location. Both the middle of the High Street and the station are only around 6 minutes' walk from the site.
23. Given the location of the SEMPA we consider that it will generate a high rate of car use.

b. What are the implications of its location adjacent to the M25 for air quality and noise?

24. For both noise and air quality reasons, a significant planted buffer will be needed from the M25. As set out in Appendix 2, this, amongst many other constraints, will limit the quantum of development that can be achieved at the SEMPA.

c. Is safe access onto Ivy Chimneys Road possible?

25. There is presently no evidence that a safe access onto Ivy Chimneys Road can be achieved as no highways work has been put into the public domain. In addition, achieving access is constrained by landownership issues. This is added to the fact that third party

land and the lifting of covenants will be needed to deliver the access. The link between Ivy Chimneys and Bridge Road under the railway bridge is entirely unsuited to an increase in traffic and hence the need for alternative routes through the development involving a new railway bridge – at significant cost and across LUL land.

d. Would the relatively small amount of employment land required within the neighbourhood centre have any particular value?

26. The majority of occupants would either work outside of Epping or would work in the town centre where there are a variety of offices (including the Civic Centre). As noted above, both the town centre and station are in locations unlikely to encourage non-car modes of transport. Providing a small amount of employment within the development will not change its fundamentally unsustainable character.

e. Is this development deliverable in respect of restrictive covenants?

27. Both deliverability and viability are unproven. The access point to Site EPP.R1 is through Mr & Mrs Annetts land off Ivy Chimneys Road. However, there is a covenant on this land restricting its use to a single private dwelling house. In addition, the Conservators of Epping Forest own a strip of land along Ivy Chimneys Road that in effect acts as a ransom strip since the land would need to be crossed in order to gain access to EPP.R1. No evidence is available as to how these can be overcome or how much it would cost to do so.
28. Moreover, for EPP.R2, the Chisenhale-Marsh Estates Company own a strip of land along the northern boundary of the site which in effect would ransom the site access. The Brook Road Play Area in the north-eastern corner of the site is leased to the Town Council.

f. Is it financially viable in light of the constraint presented by the Central Line dividing the masterplan area? Is a “bridge” over the railway the only possible means of achieving connectivity (Part (vi))?

29. Securing a bridge over the central line will require a significant and costly structure and will include land not owned by or under the control of the promoters. It is noted that the TFP in their Reg 19 representations comment that the bridge whilst desirable “is not essential in terms of vehicular access.” In our view, in order to deliver a comprehensive and integrated development where facilities on side of the railway can be accessed by those on the other, a bridge is necessary. There is no evidence that this has been costed, its costs apportioned through a development agreement, nor any agreement reached with LUL as to the ransom costs of crossing the railway. In our view this brings the viability of the whole of the SEMPA into question.

g. Is it justified to require the development to be phased?

30. The phasing of the development will need to be controlled to ensure that the appropriate areas of land for community and other infrastructure are brought forward at the time they are needed. In their representations, the promoters are reluctant to agree to any phasing restrictions. In our view this is symptomatic of having multiple landowners and no

development agreement between them, as none therefore want to have restrictions placed upon them as to the timing of delivery of housing on their particular part of the allocation.

h. What effect would the development of this area have on the purposes of the Green Belt?

31. As we set out in our representations under Matter 4, the allocation of the SEMPA is not justified by the evidence base.
32. It is clear from the Green Belt review that there will be harm to the Green Belt and that harm is greater than for other options, including our client's land at Stonards Hil.
33. Table 1 below shows the relative scoring of the land in the Phase 2 Green Belt review.

Purpose	Stonards Hill SR-0071)	EPP.R1 SR-0069/330	EPP.R2 SR-0113B	EPP.R2 SR-0113A
1. Unrestricted sprawl	No contribution	No Contribution	No contribution	No Contribution
2. Preventing coalescence	Weak	Moderate	Relatively weak	Moderate
3. Safeguarding countryside	Relatively strong	Strong	Strong	Strong
4. Preserving special character	Weak	Relatively Strong	Relatively weak	Relatively Strong
5. Assisting in urban regeneration	Not assessed	Not assessed	Not assessed	Not assessed

Table 1 : Results of Stage 2 Green Belt assessment : SEMPA compared to Stonards Hill

34. Apart from the purpose of 'checking unrestricted sprawl' where all sites were considered to make 'no contribution', our clients' site performs better on all Green Belt purposes compared to the SEMPA sites. It is clear from the assessment that the SEMPA sites are generally elevated and visible from distance, such that development will be visible from the wider countryside. Their intrusion into the countryside will therefore conflict with Green Belt policy.

EPP.R5 (Epping Sports Centre): The development requirements in Appendix 6 include that the sports centre should not be closed, or the redevelopment of the site commenced, until a suitable replacement facility is delivered and operational. Does/should the Plan find a suitable alternative location for such a facility? If not, is the allocation justified and deliverable?

35. The Council's most recent Housing Trajectory, EB410B, indicates that the site will not come forward until 2028/29 and that "*Relocation of existing uses on site can significantly delay delivery.*" There is clearly no site within the plan to which the sports centre can be relocated. As with a number of other allocations, EPP.R5 is not supported by any evidence base as to its deliverability and should be deleted.

EPP.R8 (Civic Offices): Has account been taken of the fact that the Civic Offices are now Listed?

36. Again, there is no evidence as to the deliverability of EPP.R8 for the 44 homes suggested. EB410B suggests that the site will be delivered in 2021 – 2023, yet the SSM indicates that the delivery of the site will require the cessation of existing office uses to allow

redevelopment. The SSM makes clear that the timescale for this is uncertain and the site assessment at EB805N describing the availability of the site being 'between two and 10 years.' Moreover, there is no feasibility work in the evidence base which shows how the listed building and sensitive location within the conservation area has been taken into account in defining the yield of the site.

EPP.R11 (Epping Library): Is the loss of the library justified?

37. This is clearly for the Council to answer but there is nothing in the evidence base to explain how library services to the town will be maintained or what will happen if this library closes without replacement.

Appendix 1 : South Epping Masterplan Area
Landownership Analysis

SEMPA - Landownership (see attached Landownership Plan)**Allocation EPP.R1**

1. Allocation EPP.R1 has the following land ownerships.
2. The main parcel of land is owned by:
 - John Dennis Padfield
 - Gillian Myfanwy Padfield
 - John Worby
 - Jonathan Tulloch
3. The main parcels of land fronting onto Ivy Chimneys Road are owned by:
 - Janice Hillan and Michael Annetts
 - Norman and Pamela Morris
 - Conservators of Epping Forest
4. Other parcels of land are owned by:
 - Martin John Backes
 - Jenna Properties
5. The Highways Agency own land along the M25 which has been included in the allocation.
6. London Underground own land on either side of and including the railway line.

Allocation EPP.R2

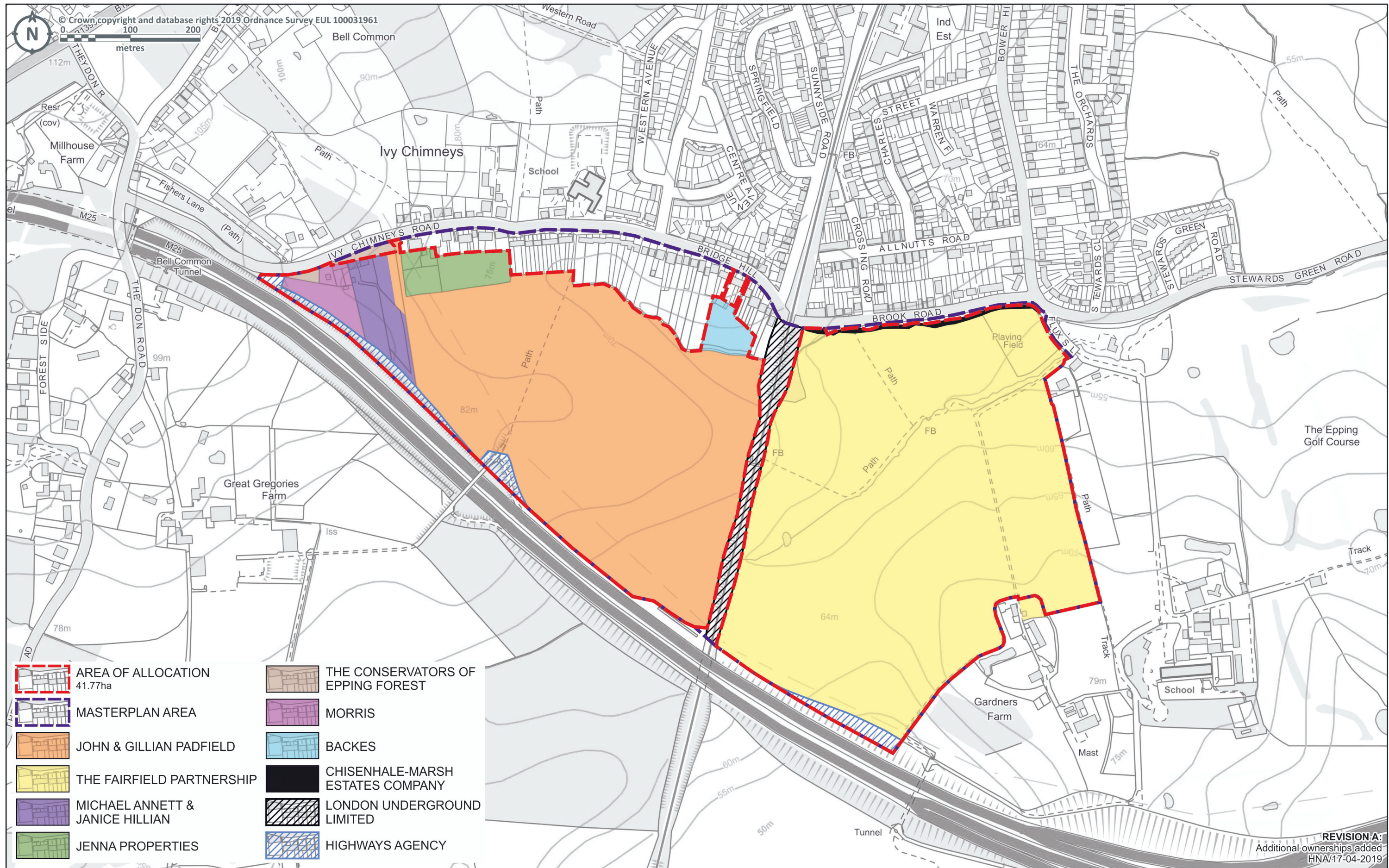
7. Allocation EPP.R2 has the following land ownerships.
8. The road frontage land is owned by the Chisenhale-Marsh Estate Co.
9. The main parcel of land is owned by James and Brendan Hunt – The Fairfield Partnership (Carlyle Group) has an option over this land. Land at the Brook Road Play Area in the top north-east corner of the site is excluded from the option agreement plan shown on The Fairfield Partnership's webpage and it is understood that this land is currently leased to the Town Council. However, the Play Area is shown as being under the control of The Fairfield Partnership in the Memo of Understanding attached to the Regulation 19 Local Plan representations submitted by Sworders, on behalf of Mr Padfield.
10. The Highways Agency own land along the M25 which has been included within the allocation.

11. London Underground own land along either side of the railway line.

Evidence of Collaboration

12. Sites EPP.R1 and EPP.R2 both have multiple landowners (10 in total across both sites).
13. A Collaboration Letter on The Fairfield Partnership's letterhead, dated 12 December 2016, has been submitted as part of The Fairfield Partnership Regulation 19 Local Plan representations, but only appears to have been signed by The Fairfield Partnership, despite lines being left for the signatures of Mr Padfield and Mr & Mrs Annetts. The Letter simply states that if the parcels of land are allocated in the adopted local plan the landowners will work collaboratively to bring forward development in a comprehensive and co-ordinated manner to ensure the timely provision of necessary common infrastructure, and to bring about the early and sustainable developments of the land.
14. A Landowner Memo of Understanding, including a Landownership Plan, was submitted as part of the Padfield Regulation 19 Local Plan representations, but it was only signed by Mr and Mrs Padfield and Jenna Properties despite lines being left for the signatures of The Fairfield Partnership, Mr Annetts and Ms Hillan. This Agreement states that 'if all the parcels are allocated in the Adopted Local Plan the intention is to maintain a close liaison between us to facilitate early and sustainable development of the land'.
15. There is therefore no agreement in place to show collaboration between all the landowners for the delivery of SEMPA. One letter signed by The Fairfield Partnership, and a separate letter signed by two other landowners does not show evidence of collaborative working among the landowners, not least because there are gaps in each of the letters where other named landowners appear not to have signed.
16. Given that there is insufficient evidence to show any form of collaboration between all the landowners, it is highly unlikely that all the landowners have agreed equalisation across the SEMPA. Equalisation will be essential in bringing both EPP.R1 and EPP.R2 forward given the high infrastructure costs (including a railway crossing) and the amount of non-developable land within the masterplan area. Equalisation is needed to ensure that the masterplan area is delivered as one, and that each landowner takes financial responsibility for infrastructure that is required across the masterplan area even though it may not be on their land.
17. The only access point to Site EPP.R1 is through Mr & Mrs Annetts land off Ivy Chimneys Road. However, there is a covenant on this land restricting its use to a single private dwelling house. In addition, the City of London as Conservators of Epping Forest own a strip of land along Ivy Chimneys Road that in effect acts as a ransom strip since the land would need to be crossed in order to gain access to EPP.R1.

18. For EPP.R2, the Chisenhale-Marsh Estates Company own a strip of land along the northern boundary of the site which in effect would ransom the site since access would need to be acquired through the strip. In addition, the Brook Road Play Area in the north-eastern corner of the site is leased to the Town Council and outside The Fairfield Partnership's option agreement. This is important because the Landscape Opportunities and Constraints Drawing submitted by The Fairfield Partnership to the Regulation 19 Local Plan shows access to EPP.R) through the Play Area.



EPPING FOREST LOCAL PLAN

Land ownership (within the allocation)

PROJECT NO

4580

DRAWN

HNA

DRAWING NO

200

DATE

FEBRUARY 2019

REV

A

SCALE

1:5000

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Appendix 2: SEMPA Capacity Constraints Analysis

SEMPA Constraints analysis

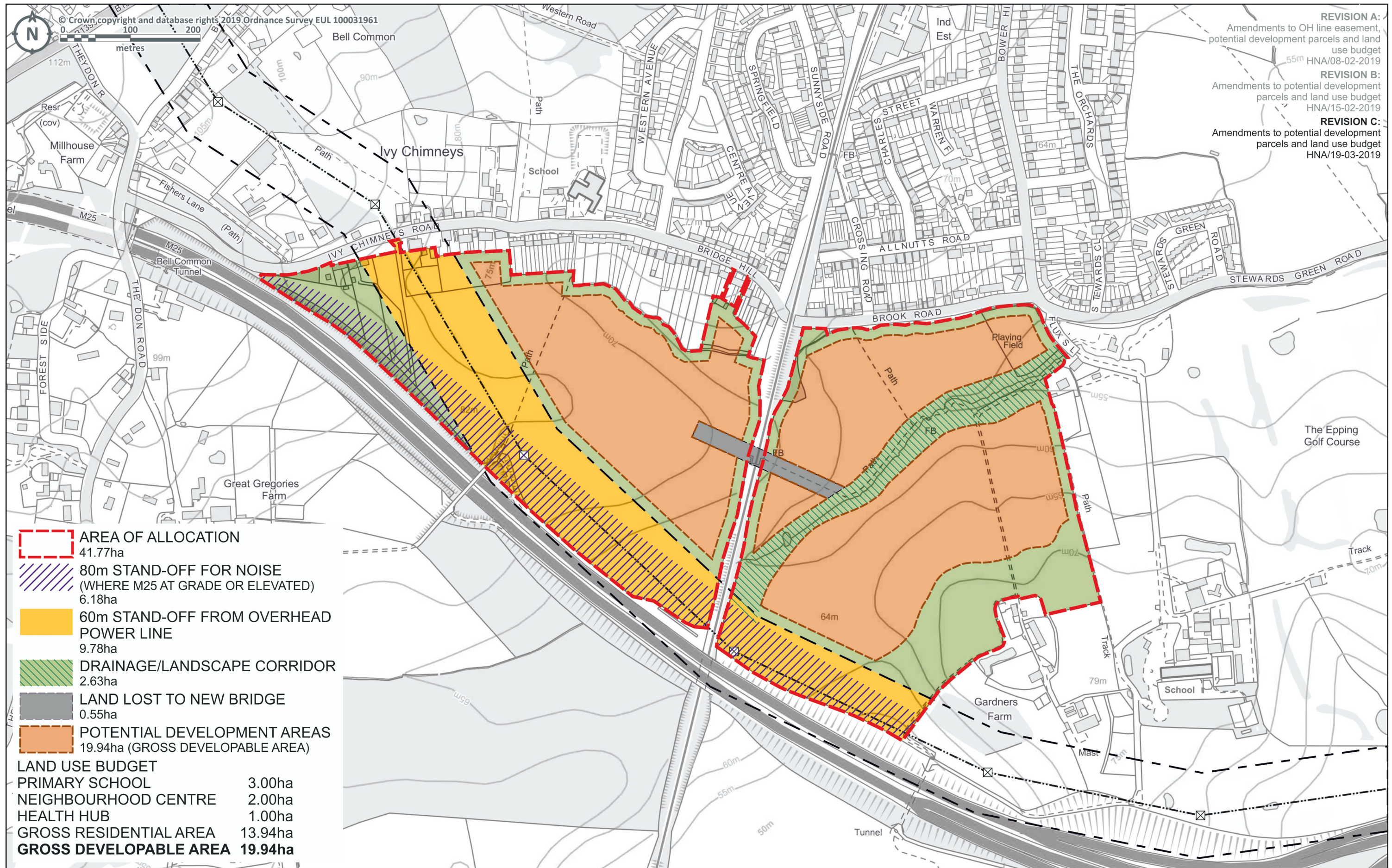
1. EPP.R1 and EPP.R2 are highly constrained as follows:
 - Overhead power lines;
 - Noise from M25;
 - Impact on air quality from M25;
 - BPA oil pipeline ((6% of site area of EPP.R1 and EPP.R2 according to Regulation 19 Local Plan Appendix B1.4.2 Assessment);
 - Railway line and embankment;
 - Grade II listed buildings; Gardners Farm and Farm Buildings (Site EPP R.2);
 - Drainage and areas of surface water flooding; and
 - Additional recreational pressure on the internationally protected Epping Forest Special Area of Conservation arising from the new residents
2. The masterplan site area of 48.92ha in Appendix 6 of the Regulation 19 Local Plan includes the following:
 - M25 embankment which is in the ownership of Highways England
 - Existing dwellings along Bridge Hill and Ivy Chimneys Road
 - Railway line and embankment
3. A more realistic area for SEMPA would be 41.77ha, as shown on Vincent & Gorbings Drawing 4580/201 Rev C attached. This area excludes (i) land within the M25 embankment, (ii) the railway line and its embankment and (iii) the areas of existing dwellings along Bridge Hill / Ivy Chimneys Road.
4. Appendix 6 of the Regulation 19 Local Plan assumes an indicative development area of 28.95ha, which represents approximately 60% of the masterplan area.
5. If the Council's 60% gross to net ratio is assumed to be correct, and using V&G's realistic masterplan area of 42ha, the indicative development area is 25ha, and not 29ha as indicated in Appendix 6. This represents a loss of 4ha of development land.
6. However, V&G Drawing 4580/201 Rev C suggests that realistically the amount of land lost due to the significant site constraints will be higher than the 20ha set out in Appendix 6.
7. Electricity pylons require a minimum horizontal stand-off distance from the centre-line of cables to the nearest part of a building of 60m for 275kv and 400kv cables as per advice from SAGE (Stakeholder Advisory Group on Extremely Low Frequency Electric and Magnetic Field). Other constraints that will result in the loss of land including protecting the setting of nearby Listed Buildings and

8. Taking all the site constraints into account V&G Drawing 4580/201 Rev C shows that 22ha of land would be lost, resulting in an indicative gross development area of 19.94ha.
9. Once land for the required primary school / early years childcare provision (3ha assuming a 3FE school with the re-location of the existing 1.5FE Ivy Chimneys Primary School), a neighbourhood centre (2ha) to include community facilities, employment and retail uses and also a new health hub (1ha) to include an integrated GP surgery, pharmacy and other medical services has been taken into account, only 13.94ha of residential land would be available for development.
10. At 33dpha, which is the assumed density used in Appendix 6, the number of dwellings that would be delivered on EPP.R1 and EPP.R2 would only be 460, and not the required 950. In order to deliver the required 950 dwellings on the site, a density of approximately 68dpha across the whole site would be needed.
11. This level of delivery has been broadly tested against Figure 10; Landscape Opportunities and Constraints Drawing in the Landscape and Green Belt Appraisal (November 2017) submitted by The Fairfield Partnership in respect of allocation EPP.R2, in response to the Regulation 19 Local Plan.
12. The housing areas shown on the Landscape and Opportunities Drawing equate to an indicative development area of around 11ha. Taking into account an allowance of 3ha for 50% of the land required across SEMPA for the primary school, the neighbourhood centre and the health hub results in only 8ha of developable land. Assuming a density of 33dpha would deliver 265 dwellings, which falls significantly short of the 500 dwellings assumed to be delivered on allocation EPP.R2 in the Regulation 19 Local Plan.

Table 1: Assessment of Capacity based upon TFP's Landscape Drawing for Site EPP.R2

TFP's Figure 10; Landscape & Opportunities Constraints Drawing Housing Areas EPP.R2	11ha
EPP.R2 land take for primary school, neighbourhood and health hub (50% of 6ha total)	3ha
Gross residential areas	8ha
Dwellings (assuming 33dpha)	265
Regulation 19 LP Capacity Assumption	500
Dwelling deficit on EPP.R2	235

13. It should be noted that none of the above calculations take into account any land required in the SEMPA for Strategic Alternative Natural Greenspace (SANGS). The Interim Mitigation Strategy for Epping Forest Special Area of Conservation, which was adopted by Epping Council's Cabinet on 18 October 2018 as a material consideration in the determination of planning applications, confirms that for sites such as SEMPA there is an expectation that Strategic Alternative Natural Greenspace (SANGS) will be an integral part of the design.
14. Natural England has issued clear guidelines in respect of the provision of SANGS which set out 'must have', 'should have' and 'desirable' criteria. One of the 'must have' criteria is that the land to be provided should be perceived as semi-natural spaces with little intrusion of artificial structures, except in the immediate vicinity of car parks (Natural England SANGS Guidelines Annex 1; Site Quality Checklist). This is to ensure that the compensatory land is sufficiently attractive to draw people away from protected areas, such as Epping Forest.
15. Given this 'must have' criterion, it is likely that some SANGS at SEMPA will need to be located outside the constrained un-developable land under the electricity pylons, and outside the M25 noise buffer zone. This is because open space with the M25 clearly visible and audible, and under electricity pylons would not be an attractive alternative. This would further reduce the net developable area.



EPPING FOREST LOCAL PLAN

Capacity analysis of Epping South

PROJECT NO

4580

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FEBRUARY 2019

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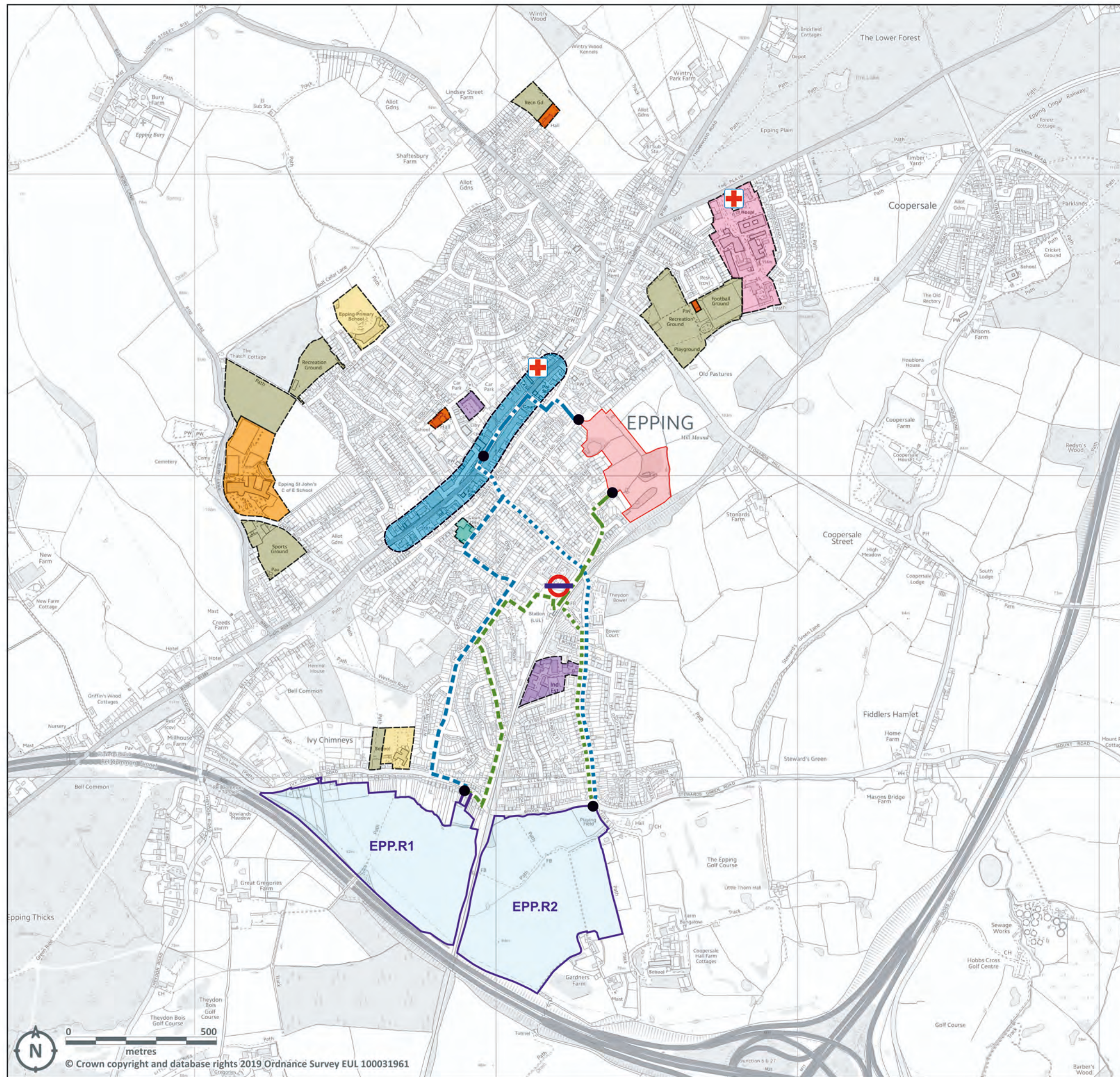
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Appendix 3

Accessibility of SEMPA compared to land at Stonards Hill



- STONARDS HILL SITE
- SOUTH EPPING
- PRIMARY SCHOOL
- SECONDARY SCHOOL
- OPEN SPACE
- SPORTS CENTRE
- PUBLIC HALL
- RETAIL FACILITIES
- HOSPITAL
- DOCTORS SURGERY
- UNDERGROUND STATION
- STONARDS HILL SITE TO RETAIL (483m - 6 mins)
- EPP.R1 TO RETAIL (1287m - 19 mins)
- EPP.R2 TO RETAIL (1448m - 20 mins)
- STONARDS HILL SITE TO UNDERGROUND STATION (483m - 6 mins)
- EPP.R1 TO UNDERGROUND STATION (1126m - 13 mins)
- EPP.R2 TO UNDERGROUND STATION (644m - 10 mins)

NOTE: Town centre defined as centre of retail area

EPPING FOREST LOCAL PLAN

Local connectivity

PROJECT NO	DRAWING NO	REV
4580	203	
DRAWN	DATE	SCALE
HNA	APRIL 2019	1:12500

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