
Hearing Statement for Epping Forest Local Plan Examination

Matter 15

Statement of behalf of the Landowner and Redrow Homes Ltd in connection with the
Land North of Abridge Road, Theydon Bois (Site Ref. SR-026C)

Epping Forest District Council Local Plan Examination

Matters and Questions

Matter 15 – Places and Sites (Policies P1-P15)

This hearing statement has been prepared on behalf of the landowner and Redrow Homes Ltd in relation to the site at land North of Abridge Road, Theydon Bois (Site Ref. SR-026C) and in response to the Matters and Questions that have been raised by the Inspector.

As set out in the guidance note provided by the programme officer, this statement is limited to the issues and questions set out in the Matters, Issues and Questions published by the Planning Inspector. It relates to the representations previously made and new evidence that has arisen since the submission of those representations.

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 P8: Theydon Bois

The Council has identified a small number of allocations to be brought forward in Theydon Bois. Whilst we wholly disagree with disproportionately low level of housing to be delivered in Theydon Bois (see Savills' Hearing Statement Matter 5), we also consider that the site specific constraints and considerations mean that those sites identified within the Draft Local Plan are not deliverable, either in their entirety or will not deliver the densities envisaged.

1. THYB. R1 (Forest Drive)

The proposed development of land north of Forest Drive will develop an existing Green Belt parcel in close proximity to the Central Line. The surrounding area comprises low-medium density housing arranged in a linear form in a mix of detached and semi detached houses. The character of the area is increasingly rural towards the north of Forest Drive and there is no footpath on the part of forest drive that would connect into the site.

The proposed allocation would result in a density of 44dph which is higher and out of character with the surrounding area. There is no evidence to suggest that feasibility work has been carried out on the site and it is unclear how this identified number of dwellings (39) could come forward in a character similar to the surrounding area. This is emphasised by the need to reduce the impact of noise from the Central Line, which would usually be dealt with through the introduction of flats on that boundary but this would be at odds with the prevailing character of the area and would not reflect the rural nature of the site.

In addition, WSP, on behalf of Redrow Homes, has identified a number of access constraints, including the substation to the east of the access and the need to create a footpath connection to the site. It is unclear from the evidence base whether these constraints have been considered and whether access is achievable in a viable form.

Moreover, reference is made in the Inspector's MIQs to the need to include access to the railway and if required, either for maintenance or to retain an existing right of way, this could further impact on the ability of the site to deliver 39 units.

The site is characterised by existing trees and hedgerows, including at the entrance to the site. In the event that the allocation is found sound, these should be specifically referred to the site specific requirements in Appendix 6 and could impact on the achievable density on the site.

2. THYB.R3 (Coppice Row)

The allocation of land at Coppice Row will not deliver a significant number of dwellings and makes no meaningful contribution to the delivery of housing in the District. Notwithstanding this, the Council has failed to take into account any constraints or design considerations that will affect any future delivery of the site and there is no evidence to suggest that they have taken these into account when deciding to allocate the site.

The site is adjacent to the Grade II listed Baldocks and as such there should be a requirement in the site specific requirements to preserve the setting of this property. Moreover, given its prominent location and proximity to a number of heritage assets, this should be a key consideration of any development coming forward.

In addition, the site density is identified as 59dph and this would assume that flats will be developed on the site. However, there has been no viability testing to demonstrate that flats would be preferable to houses in this location and therefore that the density and net additional dwellings is achievable.

Other Matters

Whilst not identified by the Inspector in her MIQs, the allocations at Theydon Bois, will make very little contribution to any mitigation on the Epping Forest SAC, and will only be of a scale to provide financial contributions. It is considered that more significant site allocations would mean that meaningful mitigation measures could be introduced to limit the impact of necessary population increase. This could be included on land north of Abridge Road through the provision of SANGs which would provide a realistic alternative for users of Epping Forest. Without such allocations, financial contributions will result in piecemeal mitigation that will not address the heart of the problem.

In addition, site THYB. R2 (Theydon Bois Underground Station Car Park) has not been included by the Inspector in her MIQs for this matter, presumably because it was included in matter 5. However, it is important to note that the overall delivery of this site is questionable. Whilst TfL have identified that the site is available for redevelopment, this has not been market tested and there is no evidence to demonstrate how the existing car park will remain operational during the course of any construction. This will be vital and TfL as landowner, will require reassurance on this from prospective purchasers.

The nature of the site, density, construction restrictions and access considerations are all constraints that will affect the viability of any development on the site. This is likely to impact on the delivery of necessary affordable housing and will ultimately undermine the delivery of the site.

The site is identified for the delivery of 12 additional dwellings and given the constraints identified above, is unlikely to have the critical mass to allow for these to be overcome. Given the contribution the site will make to the overall housing supply and doubt over the deliverability of the site, this allocation should be deleted from the Local Plan.

We have made representations at each stage of the Local Plan preparation and to relevant Hearing Sessions and it is important to emphasise that the approach that the Council has taken in respect of housing allocations at Theydon Bois is ultimately flawed and will not deliver the much needed housing in a sustainable location that the District needs. There is little evidence to justify this approach, conversely there is strong evidence to demonstrate that it would be appropriate and of benefit to allocate additional housing on large sites that make little contribution to the Green Belt and maximise the use of sustainable transport, especially given the apparent air quality issues identified by EFDC during the examination. These sites, including Land north of Abridge Road (SR 026C) can also mitigate any impact of development to the benefit of the local community and wider District. This approach should not be ignored in bringing forward the Local Plan.