

# **EFDC: Local Plan Examination**

## **Hearing Statement**

### **Matter 15: Places and Sites**

**Thursday 25<sup>th</sup> April 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 Policies P1-P15 justified, effective and consistent with national policy in the following general areas:**

1. *Does Appendix 6: Site Specific Requirements, constitute policy or supporting text? If policy, is this clear? Is the wording within Part A of each policy P1- P15 sufficient to ensure that the site specific requirements contained in Appendix 6 can be enforced, or should Appendix 6 itself contain a policy? E).*
- 1.1 Appendix 6 does not provide detailed site specific requirements for the SEMPA, presumably because the requirements that the SEMPA should make provision for are set out in Policy P1. On this basis TFP has no comments on the appendix.
2. *Are all of the "Infrastructure Requirements" included within Policies P1-P15 intended to apply to every allocated site within each policy? Is this justified with reference to the tests in paragraph 204 of the NPPF?*
- 1.2 TFP accepts the policy and anticipates that detailed infrastructure requirements will be determined as part of the masterplanning exercise and outline planning permission process.
3. *Do the infrastructure requirements within Policies P1-P15 reflect the full need for primary and secondary school expansion? (Reps ECC).*
- 1.3 The emerging masterplan for the SEMPA includes provision for a 2.1 ha primary school site within allocation EPP.R2. TFP understands that this meets EFDC's and Essex County Council's (ECC's) education infrastructure requirements for the SEMPA.
4. *Do the infrastructure requirements within Policies P1-P15 reflect the full need for improved pedestrian/cycle links? (Reps ECC).*
- 1.4 It is anticipated that the SEMPA will provide connections to the existing walking and cycling infrastructure, and introduce a package of measures where appropriate to improve the walking and cycling accessibility from the site to Epping Town Centre. Detailed requirements will be determined as part of the masterplanning exercise and outline planning permission process.

5. *Are the general requirements in relation to flood risk and air quality in each of policies P1-P15 necessary in light of the requirements of Policies DM15 and DM22 respectively?*
- 1.5 TFP does not consider that it is necessary for the site specific policies to repeat the requirements of other district-wide policies within the Local Plan, and has no objections to streamlining the Local Plan through the removal of the general requirements in relation to flood risk and air quality in each of policies P1-P15.
6. *Where the residential site allocations shown on the Maps are expected to accommodate other uses, such as schools and other services and facilities, should this be made clear on the Map Legends? In the case of schools specifically, is it necessary for the Maps to show a specific land allocation?*
- 1.6 TFP considers that the extent and location of other uses within residential site allocations are best determined through the masterplanning exercise and outline planning permission process. TFP has no objection if Map 5.1 was updated to include an indicative location for a primary school within allocation EPP.R2.
7. *Where is Stapleford Airfield? Having regard to paragraph 33 of the NPPF, what is the role of this airfield and does it have any growth or other planning-related requirements which should be addressed in the Plan?*
- 1.7 No comment.

## 2.0 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**

#### ***General Matters***

1. *Should Part K concerning the Strategic Masterplan for South Epping recognise the constraint presented by the National Grid High Voltage Electricity Overhead Line which crosses allocated sites EPP.R1, R3 and E1? (Reps N Grid).*
- 2.1 Part K highlights the need to provide within the SEMPA an appropriate buffer from the High Voltage Transmission Cables. TFP supports this approach and has detailed technical advice from WSP.
  2. *Part K(iii) indicates that new primary school and early years provision could be achieved through the relocation of Ivy Chimneys Primary School. Is this justified, because Essex County Council contends that such a solution should not be investigated?*
- 2.2 The emerging masterplan for the SEMPA includes provision for a 2.1 ha primary school site within allocation EPP.R2, either for the relocation of Ivy Chimneys Primary School, or to provide a new school. This is considered a pragmatic approach given the uncertainties associated with the relocation of Ivy Chimneys Primary School. It is anticipated that detailed discussions with regard to school provision within the Masterplan Area will take place during the masterplanning exercise.
  3. *Should Part K(viii) require the conservation or enhancement of the relevant heritage assets in order to comply with legislation and national policy? Will this be possible? (Reps HE).*
- 2.3 TFP does not consider that it is necessary for the site specific policies to repeat the requirements of other district-wide policies within the Local Plan (in this case Policy DM7 – Heritage Assets) but has no objection to the inclusion of this requirement in Part K(viii).

4. *What is the "Proposed Secondary Frontage" shown on Map 5.2?*

2.4 TFP offer no comment on this question as it does not relate to the SEMPA.

**Site Specific Matters – EPP.R1 & R2 (South Epping Masterplan Area)**

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

2.5 The SEMPA is located approximately 1.7km to the south of Epping Town Centre, and can be easily reached using sustainable modes of travel such as walking and cycling and existing/enhanced local bus services. As a result, the SEMPA is situated in a sustainable location for expansion.

2.6 WSP has calculated that a large area of Epping Town centre is within a 2km walking distance of the SEMPA, and that the entire built-up area of Epping as well as surrounding villages are within an 8km cycling distance of the SEMPA. This demonstrates that the SEMPA is within an acceptable walking and cycling accessibility of the centre of Epping.

2.7 To get from the SEMPA to the centre of Epping by walking and cycling the existing walking and cycling infrastructure provided along Brook Road, Ivy Chimneys Road, Bridge Hill, Centre Drive, Sunnyside Road, Bower Hill and Station Road will be used, which currently provides good walking and cycling accessibility from the SEMPA to the town centre. The SEMPA will provide connections to the existing walking and cycling infrastructure, and introduce a package of measures where appropriate to improve the walking and cycling accessibility from the SEMPA to Epping Town Centre.

2.8 It is recognised that the topography from the SEMPA to the town centre could be challenging to some people walking and cycling from the SEMPA to the centre of the town. From site observations, this does not necessarily have a significant impact on the number of people walking and cycling from the SEMPA to the town centre, as there is good footway provision from the SEMPA to the centre of the town. Furthermore, there are local bus services that can be accessed within an

acceptable walking distance of the SEMPA for people either unable or unwilling to walk or cycle due to the topography from the SEMPA to Epping Town Centre.

- 2.9 Specifically, to get from the SEMPA to the town centre by local bus services the existing bus stops located on Bower Hill, Stewards Green and Central Drive will be used, which provide access to a number of bus services, connecting the SEMPA to Epping Town Centre, as well as many surrounding locations including Ongar, North Weald, Harlow, Chelmsford and Loughton. The SEMPA will provide connections to the existing walking and cycling infrastructure to connect to these bus services, and introduce a package of measures, where appropriate, to improve the accessibility to local bus services from the SEMPA to the centre of Epping.
- 2.10 Although the SEMPA is situated in a sustainable location for expansion considering the distance and topography in relation to the town centre, with a range of measures and improvements being proposed where appropriate to improve the use of sustainable modes of travel from the SEMPA to the town centre, it is recognised there will be some residents who still choose to drive. As such the potential package of measures set out below has been identified for consideration during the masterplanning exercise and outline planning permission process:
- Improvements to the existing highway along Brook Road and Ivy Chimneys Road;
  - New resident parking bays along Brook Road and Ivy Chimney's Road;
  - Installation of a signal control at the junction of Brook Road and Bridge Hill (where the London Underground Central Line crosses the road);
  - Installation of MOVA control at the signalised junction of the High Road and Theydon Road; and
  - A change to the position of the stop lines on all arms of the signalised junction of the High Road and Theydon Road.
- 2.11 Based on the information outlined above it can be concluded that the SEMPA is situated in a sustainable location for expansion which can be easily reached by sustainable modes of travel, considering the distance and topography from the SEMPA to the centre of Epping, and that the introduction of a package of measures where appropriate will improve the sustainability of the SEMPA. It is also recognised that the SEMPA will generate some additional traffic on the local highway network,

and as such a potential package of measures has been identified for consideration during the masterplanning exercise and outline planning permission process where appropriate to mitigate the impact of these trips on the local highway network.

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

2.12 WSP has advised that air quality and noise considerations will require development within EPP.R2 to:

- Incorporate a suitable separation distance from the M25;
- Include a barrier/bund along the southern boundary of the development (either on Highways England land or within EPP.R2);
- Adopt a suitable building form and height in the parts of the site nearest to the M25; and
- Potentially use suitable technologies to mitigate noise and air quality impacts.

2.13 These matters are being taken into account in the development of the emerging masterplan and they do not have any implications for the quantum of development proposed within EPP.R2.

c. *What effect will the development have upon the vitality and viability of the existing town centre?*

2.14 The SEMPA will introduce at least 950 new dwellings to Epping. The existing town centre will be accessible to new residents and workers and this will have a positive effect on its vitality and viability. Retail floorspace anticipated in the SEMPA will be of a small scale and would not have a negative impact on the retail offer within the existing town centre. It will be designed to meet local needs.

d. *Is safe access onto Ivy Chimneys Road possible?*

2.15 TFP confirms that it controls the frontage of allocation EPP.R2 and can provide safe access points into the site and improve the traffic situation on Brook Road. At present two safe access points are proposed onto Brook Road enabling the creation of a sustainable public transport corridor/loop within the site.



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

2.16 TFP considers that the inclusion of a small amount of employment land within the SEMPA will contribute to the character, vitality and sustainability of the proposed new community in this location.

f. *Is this development deliverable in respect of restrictive covenants?*

2.17 TFP confirms that there are no restrictive covenants that would prevent the delivery of allocation EPP.R2.

g. *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))?*

2.18 Providing good connectivity between EPP.R1 and EPP.R2 is being explored as part of the masterplanning exercise, and is recognised as being important in relation to encouraging the use of sustainable modes of travel such as walking and cycling and local bus services. To encourage walking and cycling between the two EPP.R1 and EPP.R2 including the potential improvement to the existing pedestrian bridge, connections could be provided to the existing walking and cycling infrastructure along Brook Road and Ivy Chimneys Road, as well as a package of measures introduced along these roads to provide an alternative walking and cycling connection between the two sites. These matters will be considered in detail during the masterplanning exercise and outline planning permission process.

2.19 The need for and impact of a bridge will be considered during the masterplanning exercise. In addition, the potential of providing a shuttle bus connection between the SEMPA and the centre of Epping during peak periods, which could also be used to provide a regular bus connection between the EPP.R1 and EPP.R2, is proposed to be explored as an alternative sustainable connection between the two sites.

2.20 The masterplan will allow for the possible provision of a further bridge over the railway line between the two sites.

h. *Is it justified to require the development to be phased?*

2.21 A site providing a minimum of 950 new homes is very likely to require phasing as development plots are brought forward. The likely phasing of development is anticipated to be confirmed within the SEMPA masterplan.

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

2.22 Paragraph 134 of the NPPF sets out that the Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.23 Any significant housing allocation associated with the existing settlement of Epping would require development on the Green Belt, and EFDC's site allocations include the recycling of existing urban land within Epping. Development of the SEMPA will result in a southward extension of Epping up to the M25. The existing major road infrastructure formed by the M25 provides a long-term defensible Green Belt boundary to the south of Epping that will prevent unrestricted sprawl of the settlement and the merging of neighbouring towns. Due to the presence of existing interposing suburban residential development, the proposals for the SEMPA would largely retain the existing setting of Epping's historic core, which is focussed on the High Street.

2.24 For the reasons set out above TFP concludes that the development of the area would have a limited effect on the purposes of the Green Belt.

### **Other Matter 15 Issue 2 Policies and Sites**

2.25 TFP offer no comment on the other Matter 15 Issue 2 questions set out in the Inspector's Matters, Issues and Questions.