



APRIL 2019

Hearing Statement

Epping Forest Local Plan: Examination in Public

Matter 15

Iceni Projects Limited on behalf of
Tele Lands Improvement Limited

April 2019

ICENI PROJECTS LIMITED
ON BEHALF OF TELE LANDS
IMPROVEMENT LIMITED

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Hearing Statement
EPPING FOREST LOCAL PLAN: EXAMINATION IN
PUBLIC

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1. 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

Q5: EPP.R1 & R2 (South Epping Masterplan Area): Is this allocation justified in respect to the following:

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?

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

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

d. Is safe access to Ivy Chimneys Road possible?

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

1.1 As identified in our SVLP Representation (Regulation 19) and previous Hearing Statements, we do not consider the spatial strategy for Epping Town accords with the vision for Epping identified in the SVLP (pg 115 SVLP), nor does it align with community aspirations to fix the problems in Epping with respect to highways or air quality impacts. The majority of development in Epping Town is being located within the South Epping Masterplan, which has poor connectivity and accessibility to the town centre and does not make any attempt to improve the structural, physical or environmental problems within the town centre.

1.2 We have prepared Sustainable Development Scorecards for both the South Epping Masterplan site and land to the North West of Epping (see **Appendix A1**). This shows that the allocated South Epping Master Plan area gives a Sustainability Score of 69% with a Parity Score of 70%, whereas the Epping North West option gives a Sustainability Score of 77% with a Parity Score of 80%. Therefore, the north west spatial option can be said to give a better contribution to sustainable development, whilst providing a more equal balance across the three pillars of economic, social and environmental sustainability. The key reasons for this are as follows:

- The proximity of the M25 to the southern sites gives rise to highways, associated air quality and noise issues, not prevalent in the north west sites.

-
- The north west sites involve the delivery of the relief road, which provides infrastructure and environmental benefits to the area.
 - The north west sites are also closer to the bus routes serving Epping High Street.
 - The proximity of Epping High Street to the north west sites means that residents are more likely to walk to local services and amenities. It is unlikely that residents in the South Epping Masterplan area will walk or cycle to the town centre given it is a walk uphill, such that they are likely to use their car, which doesn't achieve the required vehicle usage reduction suggested in the Transport Assessment (**EB503**).
 - The integration of the sports/recreation facilities and other social infrastructure within the north west sites also mean that new residents are more likely to make use of them, without them being remote from existing residents.
 - The delivery of significant green and blue infrastructure that can be used as Suitable Alternative Natural Greenspace, which the South Epping Masterplan Area would not be able to deliver.
 - Based on the remaining objections identified in the Draft Statement of Common Ground with Essex County Council (**ED10B**), we understand that there is disagreement between the parties on the allocation of a school within the SVLP in the South Epping Masterplan Area. It appears that Epping Forest District Council are unwilling to commit to a school in this location and we therefore question why this is the case and whether this school will be delivered if it is not identified in the allocation.

1.3 Furthermore, whilst Lands Improvement support the release of Green Belt to achieve growth in the District, and in Epping Town in particular, the landscape and green belt evidence used to support the SVLP and the identified Site Selection Methodology does not align with the decision taking by the Council with respect to site allocations and release of green belt parcels in the SVLP. For example, the South Epping Masterplan Area is deemed to have a Very High impact if removed from the Green Belt but was chosen for allocation over sites which are deemed to have high, moderate, low and very low harm if released from the Green Belt. A further example at Epping is the Epping Sports Club, which is identified as having a very low level of harm but has not subsequently been released from the Green Belt and the development allocation discarded. By this rationale, it would seem appropriate to also remove all parcels identified at Very High harm from the Green Belt, rather than lower impact sites. In fact, it would appear for the District as a whole, the Council have ignored the land recommended for release under the Green Belt reviews and have allocated alternate parcels, which is neither objective, rational nor justified.

1.4 Overall, it is clear that the current spatial strategy for Epping Town is not appropriate as it does not address the inherent structural, physical and environmental problems with the town centre, nor provides a solution to these problems. Lands Improvement consider that the relief road and SANGs

alternative should have been considered by the Local Plan to address the significant traffic and air quality problems facing Epping Town and recreation pressure facing Epping Forest SAC. We propose a solution that is forward thinking, infrastructure led and could significantly improve the character and feel of the town centre.

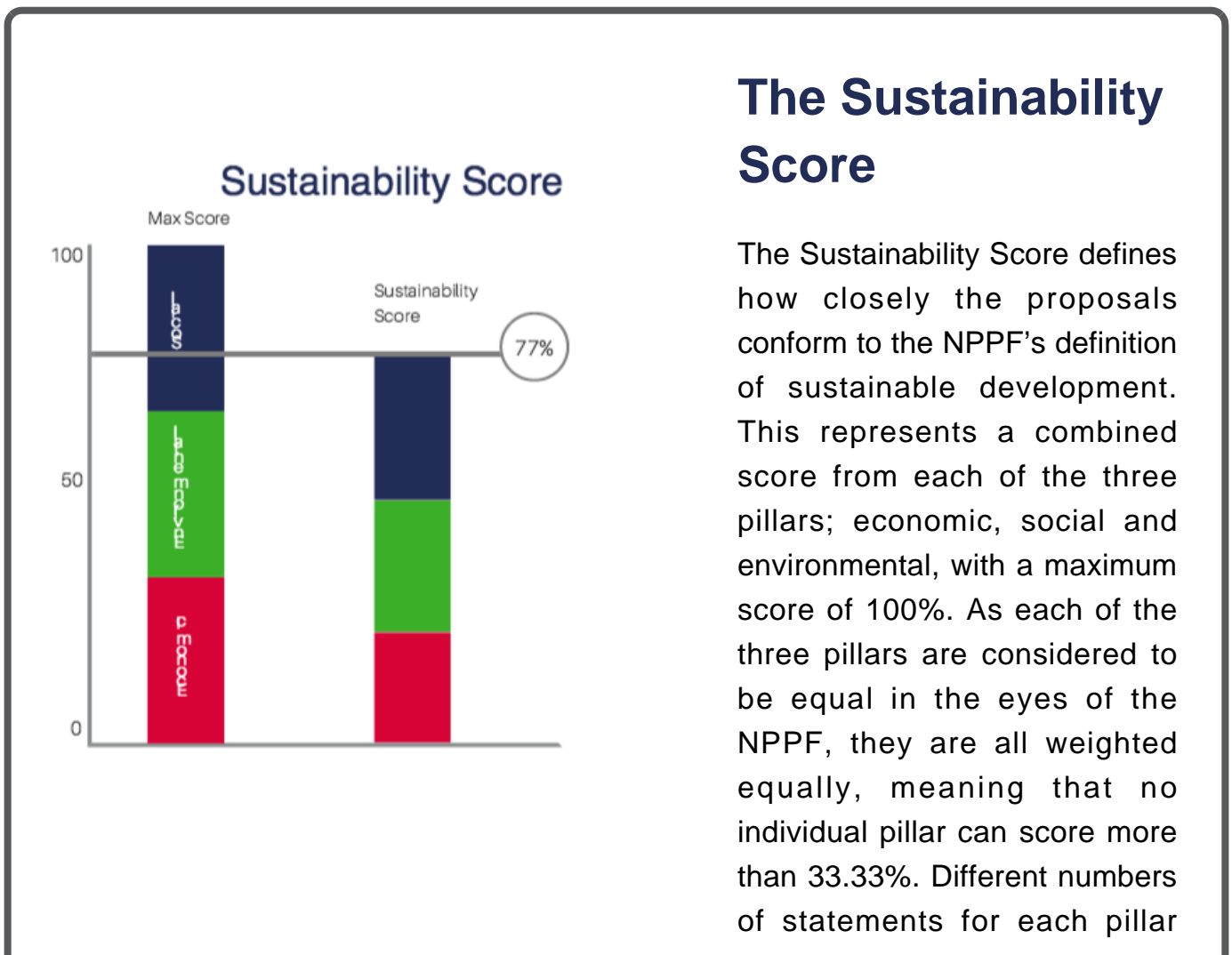
A1. SUSTAINABLE DEVELOPMENT SCORECARDS

Sustainability Report – Report No – 16675 -

ADVICE: This report is intended to provide you or third parties with an indication of the extent to which a development conforms to the National Planning Policy Framework’s definition of sustainable development, and is based on you quality of your inputs. The Sustainable Development Commission and Iceni Projects accepts no liability for any loss or damage which may be suffered by other parties as a direct or indirect result of using the Scorecard (including loss of profit, loss of opportunity, loss of business, and consequential loss).

Technical support: info@thescorecard.org.uk

Development:	Epping - North west
User ID:	16675

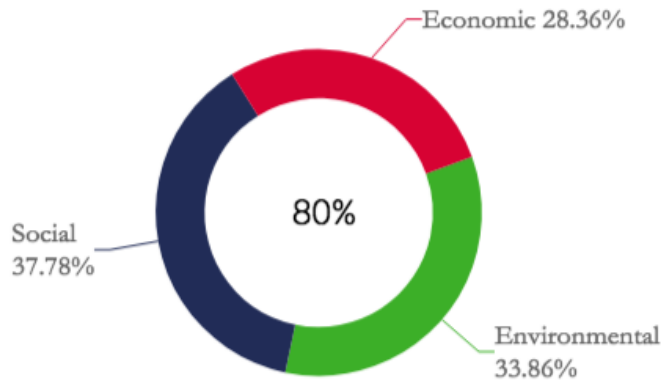


The Sustainability Score

The Sustainability Score defines how closely the proposals conform to the NPPF’s definition of sustainable development. This represents a combined score from each of the three pillars; economic, social and environmental, with a maximum score of 100%. As each of the three pillars are considered to be equal in the eyes of the NPPF, they are all weighted equally, meaning that no individual pillar can score more than 33.33%. Different numbers of statements for each pillar

means some statements are worth more to the Sustainability Score than others.

Parity Score



The Parity Score

The Parity Score assesses how equally the three pillars are balanced. This is intended to highlight where equal consideration has been given to each of the three pillars, which again reflects the approach defined by the NPPF. The maximum Parity Score is 100%, representing a completely balanced representation of each of the three pillars, regardless of the Sustainability Score.

Continued:

Wayfinders

Question 1.

Is the site in a rural location?

Yes No

Qualifier. (because of the previous answer we need clarification)

Is the site in a National Park, the Broads or Area of Outstanding Natural Beauty?

Yes No

Question 2.

Is the site in an urban location, town centre or primary shopping area?

Yes No

Question 3.

Does the site contain heritage assets, or is the site within the setting of heritage assets?

Yes No

Question 4.

Is the site in a coastal area?

Yes No

Question 5.

Does the site include areas of high flood risk?

Yes No

Question 6.

Is the site adjacent to a Minerals Safeguarding Area, or in a Minerals Consultation Area?

Yes No

Question 7.

Do the proposals include residential buildings?

Yes No

Question 8.

Do the proposals include commercial buildings?

Yes No

Qualifier. (because of the previous answer we need clarification)

Are the end users known?

Yes No

Question 9.

Do the proposals include retail buildings?

Yes No

Question 10.

Do the proposals include on-site renewable technologies?

Yes No

Question 11.

Do the proposals include communications infrastructure?

Yes No

Question 12.

Do the proposals develop open or recreational land?

Yes No

Question 13.

Do the proposals include mineral extraction?

Yes No

Your Inputs

Statement 1: The proposals maximise water efficiency, especially when located in water-stressed areas.

Your Notes:

Pillar:

Score

Environmental

Strongly
Agree

Statement 2: A Travel Plan has been produced which promotes the use of sustainable travel options.

Your Notes:

Pillar:

Score

Environmental

Strongly
Agree

Statement 3: The proposals have been designed to give priority to and encourage pedestrian and cycle movements across the site (where appropriate).

Your Notes:

Pillar:

Environmental

Score

Strongly
Agree

Statement 4: The proposals include facilities for charging of electric vehicles.

Your Notes:

Pillar:

Environmental

Score

Neutral

Statement 5: The proposals have been sited in close proximity to a sufficient amount of sustainable transport options for the intended use.

Your Notes:

Pillar:

Environmental

Score

Agree

Statement 6: The proposals maximise residential development in appropriately sited areas.

Your Notes:

Pillar:

Economic

Score

Strongly
Agree

Statement 7: The proposals maximise potential for the retention, enhancement or creation of existing street markets.

Your Notes:

Pillar:

Score

Economic

Neutral

Statement 8: Proposals within town centres maximise provision for town centre uses identified in the local plan.

Your Notes:

Pillar:

Score

Economic

Agree

Statement 9: Local context and distinctiveness has been investigated and incorporated as much as possible as part of the proposal's design.

Your Notes:

Pillar:

Score

Social

Agree

Statement 10: The proposals provide the opportunity for users / occupiers to walk to essential facilities either within or outside of the site.

Your Notes:

Pillar:

Score

Environmental

Strongly
Agree

Statement 11: All opportunities have been undertaken for the re-use, retention, and refurbishment of existing buildings.

Your Notes:

Pillar:

Score

Environmental

Not

Statement 12: The proposals concentrate development on poorer quality agricultural land.

Your Notes:

Pillar:

Economic

Score

Neutral

Statement 13: The proposals and any associated infrastructure are sited so as to have a minimal impact on surrounding areas of tranquillity.

Your Notes:

Pillar:

Social

Score

Strongly
Agree

Statement 14: The proposals will minimise the adverse effect of noise on the health and quality of life of new users and local residents / users.

Your Notes:

Pillar:

Social

Score

Agree

Statement 15: The proposal will be designed to minimise impact on surrounding light pollution.

Your Notes:

Pillar:

Environmental

Score

Strongly
Agree

Statement 16: The cumulative effects of the new development on air quality will be effectively minimised both during construction and operation.

Your Notes:

Pillar:

Score

Environmental

Agree

Statement 17: The proposals are appropriate in terms of adverse impact from pollution and land instability, and these risks have been considered and effectively minimised.

Your Notes:

Pillar:

Score

Environmental

Strongly
Agree

Statement 18: The existing or firmly planned physical infrastructure of the area is sufficient to support the needs which the development will generate.

Your Notes:

Pillar:

Score

Economic

Agree

Statement 19: The proposal will provide housing that reflects the needs of different groups (considering size, type and tenure) in the local community (such as children, disabled users, older people, or those wishing to build their own homes) and is in line with the Local Plan's desired mix of housing

Your Notes:

Pillar:

Score

Social

Strongly
Agree

Statement 20: The proposals maximise the provision of affordable housing based on locally identified need reflected in the policies of the local plan or other relevant needs assessments.

Your Notes:

Pillar:

Score

Economic

Strongly
Agree

Statement 21: The proposals adequately adapt in a sustainable manner to the risk of internal overheating.

Your Notes:

Pillar:

Score

Environmental

Strongly
Agree

Statement 22: The proposals connect to or create/expand a local decentralised energy network.

Your Notes:

Pillar:

Score

Environmental

Strongly
Disagree

Statement 23: The proposals maximise best practice energy efficiency measures to both existing and new buildings on site.

Your Notes:

Pillar:

Score

Environmental

Strongly
Agree

Statement 24: The proposals are within appropriate proximity to a range of employment opportunities needed by its occupiers.

Your Notes:

Pillar:

Score

Economic

Neutral

Statement 25: The proposals aid in the growth of the UK's renewable and low carbon industries.

Your Notes:

Pillar:

Score

Economic

Strongly
Disagree

Statement 26: The development will contribute directly and indirectly to long-term local employment opportunities.

Your Notes:

Pillar:

Score

Economic

Neutral

Statement 27: All publicly accessible spaces are well overlooked within the proposals.

Your Notes:

Pillar:

Score

Social

Strongly
Agree

Statement 28: The proposals provide sufficient communal areas to facilitate social

interaction outside the confines of the private areas.

Your Notes:

Pillar:

Score

Social

Strongly
Agree

Statement 29: The proposal constitute a Community Right to Build Order.

Your Notes:

Pillar:

Score

Social

Strongly
Disagree

Statement 30: The proposal's design takes account of the views of all applicable sections of the local community, and this can be adequately demonstrated through design development.

Your Notes:

Pillar:

Score

Social

Strongly
Agree

Statement 31: The proposals constitute an outstanding or innovative design.

Your Notes:

Pillar:

Score

Social

Agree

Statement 32: A Crime Prevention Design Advisor has been consulted on the design of the proposals, and all recommendations have been incorporated.

Your Notes:

Pillar:

Score

Social

Agree

Statement 33: The proposals create a place with a locally inspired or otherwise distinctive character.

Your Notes:

Pillar:

Score

Social

Strongly
Agree

Statement 34: The density of development has been optimised in line with the local character and context.

Your Notes:

Pillar:

Score

Social

Strongly
Agree

Statement 35: The proposal's design enhances the streetscape and, where appropriate, allows social spaces to develop.

Your Notes:

Pillar:

Score

Social

Strongly
Agree

Statement 36: The proposals will allow sufficient and adequate access for all potential users.

Your Notes:

Pillar:

Score

Social

Strongly
Agree

Statement 37: The proposals sufficiently demonstrate that the existing open space and / or sports & recreational facilities are surplus to local requirements, or provide complete replacement (both in terms of quantity and quality of provision).

Your Notes:

Pillar:

Score

Social

Strongly
Agree

Statement 38: The proposals protect existing rights of way across or adjacent to the site, and enhance these, either through improvements or by the provision of additional links to the networks.

Your Notes:

Pillar:

Score

Social

Agree

Statement 39: It has been demonstrated that sufficient local school places are available to cater for the increased demand, and if not, provide for the creation of new or expanded educational establishments.

Your Notes:

Pillar:

Score

Social

Agree

Statement 40: The proposals are within close proximity to a sufficient extent of high quality sports and recreation facilities, or if not, they create this.

Your Notes:

Pillar:

Score

Social

Strongly
Agree

Statement 41: The proposals are within close proximity to a sufficient extent of accessible, high quality open space, or if not, they create this.

Your Notes:

Pillar:

Score

Social

Strongly
Agree

Statement 42: The development provides (or is in close proximity to) the amenities and services needed by its expected users.

Your Notes:

Pillar:

Score

Economic

Agree

Statement 43: The proposals promote the development and / or enhancement of local services and community facilities.

Your Notes:

Pillar:

Score

Economic

Agree

Statement 44: The proposals create or significantly enhance locally-identified priority habitats / species and avoid damage to national/internationally designated wildlife sites.

Your Notes:

Pillar:

Score

Environmental

Strongly
Agree

Statement 45: The proposals create, maintain or enhance any planned or existing ecological / green infrastructure networks.

Your Notes:

Pillar:

Score

Environmental

Strongly
Agree

Statement 46: The proposals maximise development on brownfield land of low biodiversity value.

Your Notes:

Pillar:

Score

Environmental

Strongly
Disagree

Statement 47: The proposals provide overall net gains in biodiversity value.

Your Notes:

Pillar:

Score

Environmental

Strongly
Agree

Statement 48: The proposals maximise the incorporation of green and/or blue space that directly aids in adapting to the effects of climate change.

Your Notes:

Pillar:

Environmental

Score

Strongly
Agree

How to improve your score

Biodiversity

In order to improve scores for biodiversity related issues, the proposals should seek to better develop the biodiversity strategy for the site, possibly with the assistance of a qualified ecologist. Additional areas of the site should be devoted to ecologically attractive habitat to increase biodiversity value, creating or enhancing green infrastructure, and addressing locally identified priority habitats and species.

Where already present on the site, the proposals should also seek to enhance blue or green space to act as a buffer against urban heat island effects.

Energy and Climate

In order to improve scores for energy and climate related issues, sustainability and energy consultants should be appointed as part of the design team. The proposals should seek to promote more energy efficient design of buildings and services. Passive design should be reviewed to improve U-values, air tightness and thermal bridging. Building services should be reviewed to improve the efficiency of systems, including heating, cooling, ventilation and lighting. Renewable and low carbon electricity and heat sources should also be adopted.

The risk of internal overheating for the proposals should also be fully addressed and demonstrated, using an appropriate methodology, seeking to mitigate this risk through the use of passive (non-energy consuming) means wherever possible.

If possible, the proposals should seek to connect to, or create, a decentralised energy network to provide low carbon heat and power to proposed and neighbouring properties. If appropriate, the proposals should also promote the potential for community-led initiatives to generate

renewable or low carbon energy.

Layout and Design

In order to improve scores for the proposal's layout and design, the scheme should address a wide range of issues related to placemaking. The local context, character and density should be addressed within the proposals. Safe and accessible public spaces should be provided with active frontages to buildings. Wayfinding and access across the site and buildings for all potential users should be considered.

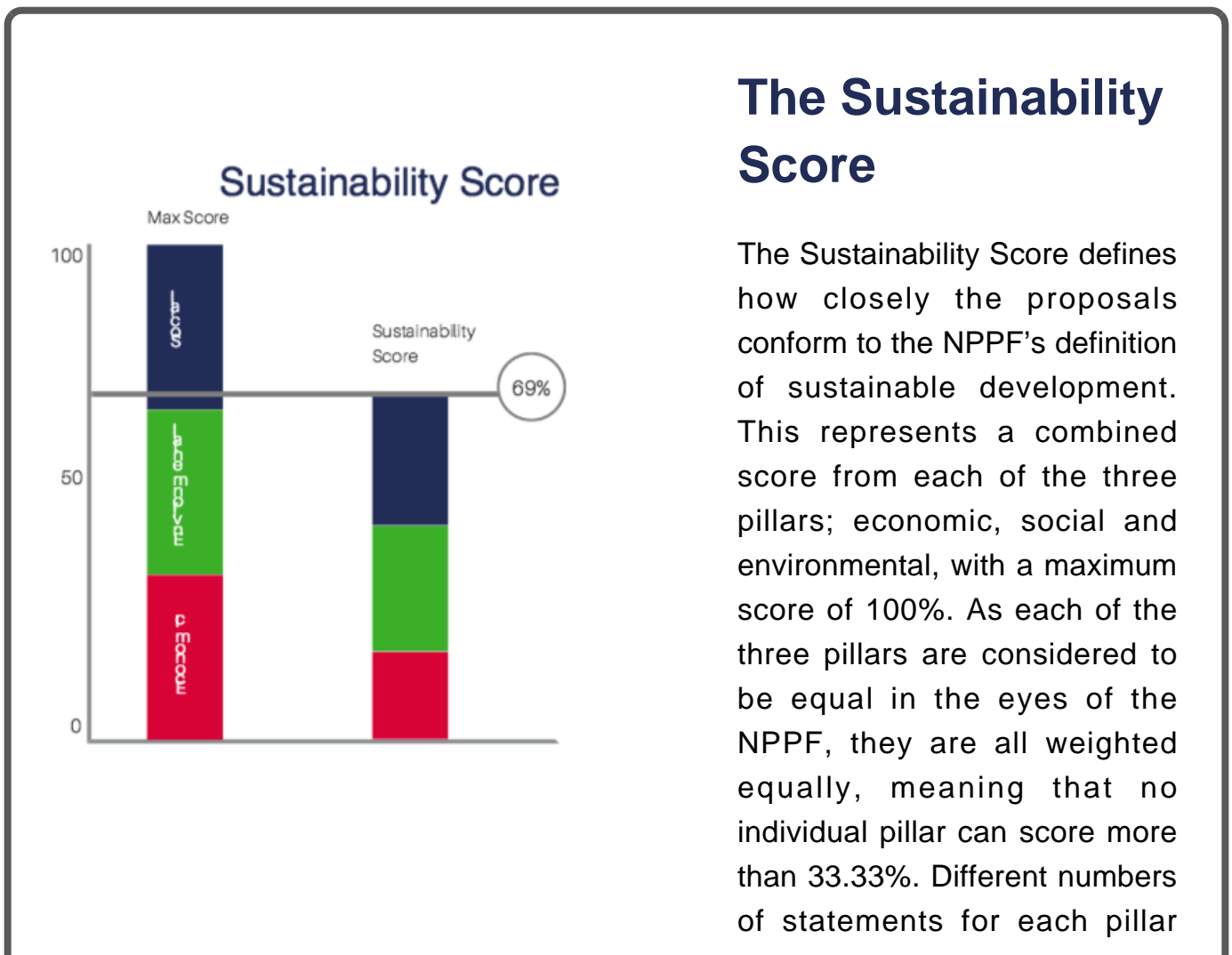
The proposals should also demonstrate that the views of all applicable sections of the community have been accounted for, with relevant feedback forming part of the design. If possible, the scheme should incorporate a Community Right to Build Order to ensure that community interests are represented in the proposals.

Sustainability Report – Report No – 18140 -

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Technical support: info@thescorecard.org.uk

Development:	Epping - South
User ID:	18140

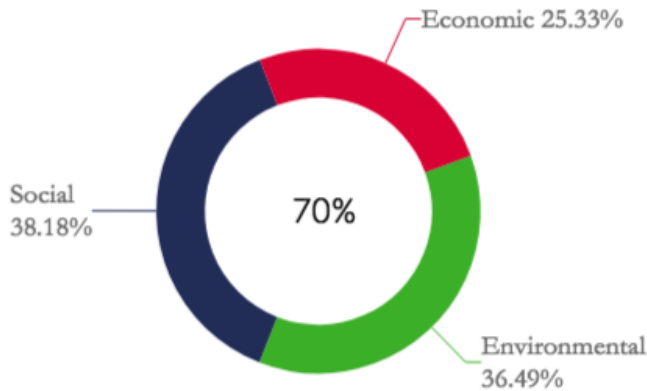


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Pillar:

Score

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Environmental

Score

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Your Notes:

Pillar:

Environmental

Score

Neutral

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Environmental

Score

Agree

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Your Notes:

Pillar:

Score

Environmental

Not
Applicable

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Your Notes:

Pillar:

Score

Economic

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Your Notes:

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Economic

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Pillar:

Score

Social

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Statement 41: The proposals are within close proximity to a sufficient extent of accessible, high quality open space, or if not, they create this.

Your Notes:

Pillar:

Score

Social

Agree

Statement 42: The development provides (or is in close proximity to) the amenities and services needed by its expected users.

Your Notes:

Pillar:

Score

Economic

Disagree

Statement 43: The proposals promote the development and / or enhancement of local services and community facilities.

Your Notes:

Pillar:

Score

Economic

Agree

Statement 44: The proposals create or significantly enhance locally-identified priority habitats / species and avoid damage to national/internationally designated wildlife sites.

Your Notes:

Pillar:

Score

Environmental

Strongly

Agree

Statement 45: The proposals create, maintain or enhance any planned or existing ecological / green infrastructure networks.

Your Notes:

Pillar:

Score

Environmental

Strongly
Agree

Statement 46: The proposals maximise development on brownfield land of low biodiversity value.

Your Notes:

Pillar:

Score

Environmental

Strongly
Disagree

Statement 47: The proposals provide overall net gains in biodiversity value.

Your Notes:

Pillar:

Score

Environmental

Strongly
Agree

Statement 48: The proposals maximise the incorporation of green and/or blue space that directly aids in adapting to the effects of climate change.

Your Notes:

Pillar:

Score

Environmental

Strongly
Agree

How to improve your score

Community Facilities

In order to improve scores for issues related to community facilities, the proposals should seek to incorporate or enhance local and accessible community facilities at an appropriate scale to the development. Open space, and sports and recreation opportunities should be included or enhanced where possible. In addition, the effect of the proposals on existing local facilities, such as schools and healthcare, should be addressed in the proposals.

The facilities proposed should be relevant to the development, with supporting evidence provided to demonstrate a sufficiency. They should also be accessible by foot using safe pedestrian routes. Where present, rights of way should be protected or enhanced through the proposals.

Biodiversity

In order to improve scores for biodiversity related issues, the proposals should seek to better develop the biodiversity strategy for the site, possibly with the assistance of a qualified ecologist. Additional areas of the site should be devoted to ecologically attractive habitat to increase biodiversity value, creating or enhancing green infrastructure, and addressing locally identified priority habitats and species.

Where already present on the site, the proposals should also seek to enhance blue or green space to act as a buffer against urban heat island effects.

Site and Location

In order to improve scores for site and location related issues, the proposals should seek to demonstrate that the development has been

appropriately sited for the intended use. Users and occupiers should be able to walk to essential facilities either within or outside the site. Where present, existing buildings should be retained and reused. The proposals should incorporate the local context.

If the development is in a rural location, it should be demonstrated that the land is of poor agricultural quality, which limits the range of uses or yields.

If the development includes renewable and/or low carbon energy sources, the visual impact of the proposals should seek to satisfy all relevant parties.