

EPHING FOREST DISTRICT COUNCIL
NEIGHBOURHOODS

REC'D 29 JAN 2018

ACK

REFERRED TO

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29th January 2018

Our Ref: RMJ/Greenacres

Dear Sirs,

EPHING FOREST LOCAL PLAN – SUBMISSION VERSION 2017
GREENACRES, IVY CHIMNEYS

Please find attached a Submission Document in respect of your consultation on the above.

This is made on behalf of Mr. M. Annetts and Ms. J. Hillan of [REDACTED] who own land situated within the proposed South Epping Master Plan Area.

I am their appointed Agent and adviser in respect of your Local Plan process.

Yours sincerely

[REDACTED]

Ryan Jones B.Sc., C.Eng., MICE
(Consultant)

Epping Forest District Council
Planning Policy Team
Neighbourhoods Directorate
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Epping Forest District Council

Local Plan – Submission Version 2017

1. Introduction

This representation is made on behalf of Mr. M. Annetts and Ms. J. Hillan, the owners of [REDACTED], [REDACTED] Epping, [REDACTED] (hereafter called the 'Owners').

The submission is made as a direct response to proposals outlined in the Epping Forest Local Plan – Submission Version 2017 dated December 2017. The comments in this submission are primarily related to the South Epping Master Plan Area.

The Owners property lies within the Master Plan Area referenced EPP.R1. The attached plan shows the extent of ownership (edged red and green) with the area edged green being agreed for inclusion in the Master Plan Area.

The Owners wish to make it absolutely clear from the outset that this submission has been developed in conjunction with the other major landowners within the Master Plan Area (EPP.R1 and EPP.R2). There is a determination within this group of landowners not only to work collaboratively together, but also to work with the Council to bring forward development in a comprehensive, sustainable and coordinated manner.

2. Representation Comments

a) The South Epping Master Plan Area (SEMPA):

This represents a sustainable and deliverable expansion to the town. The landowners are working together with stakeholders to create a strategic master plan that provides services and infrastructure alongside new homes. The land is largely unconstrained in terms of landscape, agricultural land quality, flood risk, ecology, air quality, noise, existing infrastructure or ownership.

b) SP2 Spatial Distribution Strategy:

The Owners support the spatial distribution and direction of growth for Epping and concur that the SEMPA reflects the most appropriate direction of growth consistent with SP2 Spatial Distribution Strategy criteria vi (Green Belt value and suitable criteria for development) and vii (best and most versatile).

c) SP3 – Place Shaping:

The Owners support in principle the production of a strategic master plan to shape the planning of the SEMPA, subject to the flexibility of the scope of the strategic master plan (as recognised at paragraph 2.91), and the recognition at paragraph 2.96 and Policy DM9 that such plans need not be adopted as Supplementary Planning documents. It is vital that strategic master plans, design codes, planning performance agreements and review by the quality review panel can be efficiently and flexibly managed to avoid delays in bringing proposals forward.

d) Policy SP6 Green Belt and District Open Land:

The need to roll back Green Belt to deliver sustainable patterns of development on land South of Epping is overdue and is therefore fully supported.

e) Policy SP7 The Natural Environment etc:

The Owners support the objective to protect existing and provide new green and blue infrastructure, and will promote, with the other landowners, a comprehensive approach in the SEMPA. This will include new connected green spaces that will bring a range of recreational opportunities alongside other green infrastructure uses to provide alternatives to the Epping Forest SAC and Lee Valley SPA.

The Owners are also willing to consider appropriate and justified financial contributions to the management of new infrastructure in line with Draft Policy DM2.

f) Policy DM20 Low Carbon and Renewable Energy

The Owners object to the requirement at clause D for strategic master plans to “demonstrate how the potential to incorporate infrastructure for district heating can be provided” as being insufficiently clear. Generally, development of 950 dwellings would be too small to deliver this infrastructure without significant public subsidy.

District heating is not well suited to conventional residential densities. Alternative land uses are needed to provide a balanced demand for the heat load and developers are dependent on utility providers to operate and deliver such systems.

In addition, because the SEMPA is divided by the London Underground line, it is considered that the ability to deliver one district heating scheme for EPP.R1 and EPP.R2 is highly unlikely.

g) Policy P1 - Epping

The Owners concur with the background analysis that identifies south of Epping as the preferred direction of growth for the town by virtue of its low landscape and Green Belt sensitivity, proximity to the London Underground station, and the general lack of constraint.

The Owners are committed to working with the other landowners to deliver an innovative development that brings with it:

- i. New infrastructure (including improvements to local highways)
- ii. The provision of a suitable landscape setting and long-term defensible Green Belt boundary
- iii. New recreational and habitat provision that takes recreational pressure off Epping Forest.

The Owners endorse the identification of a SEMPA for 950 dwellings but would object to any fixed apportionment between R1 and R2. There is no doubt that this could constrain unnecessarily the strategic master planning process and decisions regarding the location of other land uses such as, for example, the neighbourhood centre.

The housing delivery trajectory within the Infrastructure Delivery Plan of 45-50 dwellings per site per annum from 2022/3 to 2031/2 is noted. The Owners do not agree with this level of delivery. Providing the Local Plan is progressed to adoption in a timely manner then an accelerated timescale for delivery will should be possible, particularly if housing market forces dictate. There is no basis for artificially constraining delivery once a policy is in place such that development can come forward as soon as possible.

The Owners object to the requirement for a Strategic Master Plan to be 'formally endorsed' by the Council which suggests the adoption of the Plan as a Supplementary Planning Document. This could risk delaying progress on proposals and is contrary to Policy DM9 which asks for greater flexibility in the planning process. It is suggested therefore that the word 'formally' be deleted.

The Owners object to the requirement to provide employment within the proposed neighbourhood centre. Retail, health and education uses will inherently bring new jobs along with them, and residential uses will also include home workers. The requirement to include employment could prove problematic to deliver alongside other domestic and neighbourhood uses and may also be of such a small scale that it fails to generate market interest. Criteria ii should instead refer to the potential for employment to be created as part of the new neighbourhood centre and education uses.

The Owners support the principle of the appropriate provision of health facilities but would note that the delivery of such facilities is dependent on support from GP practitioners and the NHS. The policy should, instead, refer to safeguarding suitable land for health facilities.

The SEMPA will deliver comprehensive supporting infrastructure and uses. The Owners support the recognition at Criterion E that development proposals must contribute proportionately to the delivery of strategic infrastructure.

The Owners object to the detailed wording of the policy in that it should be explicit that:

- i. Other site allocations within Epping and other windfalls (such as for example any potential future redevelopment of the Ivy Chimneys Primary School site) will be required to make appropriate contributions to strategic infrastructure such as education and health facilities and strategic transport measures (such as car clubs) which are likely to be located in the SEMPA.
- ii. The level of appropriate contribution sought from the landowners will take account of the provision of serviced sites for strategic infrastructure uses in the SEMPA and will be reduced commensurately.

The neighbourhood centre, Primary School and any health uses should be co-located to create a hub for local services and activity. Given that these facilities would also serve the existing community, these would be best located on or close to existing road frontages to maximise accessibility and the potential for passing trade.

The Owners consider that the SEMPA can be developed from either end towards the middle and need not be the subject of any artificial phasing. The Owners consider that there is some ambiguity in the wording around the status of the proposed bridge and the modes of transport supported. It is considered that the bridge, while desirable, is not essential in terms of vehicular access.

The Owners support the provision of a suitable road layout to include a bus service. It is suggested that the bus service be delivered on a staged basis to include safeguarding the land for and making appropriate contributions towards any bridge crossing of the railway line.

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). The Owners 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.

The Owners note that other representations to the SEMPA, including site-specific matters, can also be submitted separately by individual parties.

RMJ SERVICES
January 2018
Final Version



$$\begin{aligned}
 (118 + 202) \times 65 / 2 &= 10400 \\
 40 \times 32.5 &= (1300) \\
 &= 9100 \\
 &= 0.91 \text{ ha} \\
 &= 2.24 \text{ acres}
 \end{aligned}$$

PLAN No.
 RJ/Annetts/01

OS MasterMap 1250/2500/10000 scale
 Monday, October 2, 2017, ID: CM-00658946
 www.centremapslive.co.uk

1:1250 scale print at A4, Centre S45372 E, 200905 N

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FOR A BETTER POINT