



**Representation form for Submission Version of the Epping Forest District Local Plan 2011-2033 (Regulation 19 publication)**

This form should be used to make representations on the Submission Version of the Epping Forest District Local Plan which has been published. Please complete and return by 29 January 2018 at 5pm. An electronic version of the form is available at <http://www.efdclocalplan.org/>

**Please refer to the guidance notes available before completing this form.**

**Please return any representations to:** Planning Policy, Epping Forest District Council, Civic Offices, 323 High Street, Epping, Essex, CM16 4BZ

Or email them to: [LDFconsult@eppingforestdc.gov.uk](mailto:LDFconsult@eppingforestdc.gov.uk)

**BY 5pm on 29 January 2018**

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

***Please attach any documents you wish to submit with your representation***

**Part A**

1. Are you making this representation as? (Please tick as appropriate)

a) Resident or Member of the General Public  or

b) Statutory Consultee, Local Authority or Town and Parish Council  or

c) Landowner  or

d) Agent

Other organisation (please specify)

2. Personal Details

3. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Michael"/>
Last Name	<input type="text"/>	<input type="text" value="Calder"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="[REDACTED]"/>	<input type="text" value="[REDACTED]"/>
Address Line 1	<input type="text" value="C/O Agent"/>	<input type="text" value="[REDACTED]"/>
Line 2	<input type="text"/>	<input type="text" value="[REDACTED]"/>
Line 3	<input type="text"/>	<input type="text" value="[REDACTED]"/>
Line 4	<input type="text"/>	<input type="text" value="[REDACTED]"/>
Post Code	<input type="text"/>	<input type="text" value="[REDACTED]"/>
Telephone Number	<input type="text"/>	<input type="text" value="[REDACTED]"/>
E-mail Address	<input type="text"/>	<input type="text" value="[REDACTED]"/>

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**Part B – If necessary please complete a separate Part B form for each representation**

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4. To which part of the Submission Version of the Local Plan does this representation relate?  
(Please specify where appropriate)

Paragraph  Policy  Policies Map

Site Reference  Settlement

5. Do you consider this part of the Submission Version of the Local Plan:

\*Please refer to the Guidance notes for an explanation of terms

a) Is Legally compliant Yes  No

b) Sound Yes  No

If no, then which of the soundness test(s) does it fail\*

Positively prepared  Effective

Justified  Consistent with national policy

c) Complies with the duty to co-operate Yes  No

6. Please give details of why you consider the Submission Version of the Local Plan is not legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments

See attached sheet

*(Continue on a separate sheet if necessary)*

7. Please set out what change(s) you consider necessary to make the Submission Version of the Local Plan legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See attached sheet

*(Continue on a separate sheet if necessary)*

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

**No**, I do not wish to participate at the hearings

**Yes**, I wish to participate at the hearings

9. If you wish to participate at the hearings, please outline why you consider this to be necessary:

In order to fully explore the site selection process with the Council in relation to the representation site in particular.

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

10. Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination (Please tick)

Yes       No

11. Have you attached any documents with this representation?

Yes       No

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Signature:

Date:

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# Phase 2

PLANNING &  
DEVELOPMENT  
LIMITED

[REDACTED]

## Epping Forest District Draft Local Plan 2018 Submission Version Response on Behalf of [REDACTED]

### Introduction

These representations to the Submission Draft Local Plan are submitted on behalf of [REDACTED], who have an interest in land at [REDACTED]. This site is the subject of an extant planning permission for residential development and should be allocated for development. Details of the extant planning permission and the current proposals are set out in our representations below.

[REDACTED] is a local housebuilder, based in Essex, with a proven track record of delivering quality housing. Subject to the allocation of the site [REDACTED] would work in partnership with Epping Forest District Council to prepare a technically robust detailed planning application, to be followed by the immediate delivery of much needed housing in this location within the first five years of the Local Plan.

These responses relate directly to the questions Q6 and Q7 on the representation form and hence are labelled as such.

### Policy SP2 Spatial Development Strategy 2011-2033

Q6: We support Epping Forest District Council's acknowledgment that "exceptional circumstances" exist to justify the release of land from the Green Belt in order to meet its OAN. The next step is to select the most suitable and sustainable sites.

Policy SP2 states that the Council will follow a sequential approach in respect of site allocations and housing delivery as set out in criteria (i) to (viii). This approach sets out a strategy, which does not follow the scale or sustainability of settlement types to accommodate development and instead follows a set of locally derived criteria in order of what is considered to be the local priority.

In accordance with the order of priority stated in the Submission Local Plan sequential approach we have assessed our site as follows:

1. *A sequential flood risk assessment – proposing land in Flood Zone 2 and 3 only where need cannot be met in Flood Zone 1.*

Directors: [REDACTED]

[REDACTED]



# Phase 2

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The land proposed for housing development is entirely located within Flood Zone 1.

## *2. Sites located on previously developed land within settlements*

The site is a former commercial site with an extant implemented planning permission for residential development. The site is therefore previously developed land within the Green Belt and is of low environmental quality.

Paragraph 17 of NPPF sets out 12 core principles of sustainable development, including the use of previously developed land and the allocation of land for development which has “lesser environmental value”, the latter being repeated at paragraph 110 of NPPF. This supports development on this site, which is not high quality agricultural land.

## *3. Sites located on open space within settlements where such selection would maintain adequate open space provision within the settlement.*

The land is not allocated for open space which should be identified as a positive aspect of the site. The delivery of the site for residential development will provide for local open space provision.

## *4. Previously developed land within the Green Belt (in anticipation of the NPPF being updated to take account of the proposed changes published in December 2015).*

The site is previously developed land within the Green Belt and should therefore be a preferred location for new residential development rather than the allocation of high quality agricultural land, in open countryside and on higher quality Green Belt land.

## *5. Greenfield/Green Belt land on the edge of settlements: Of least value to the Green Belt if the land meets other suitable criteria for development.*

The land proposed for development is on the edge of the linear settlement of Stableford Abbots and has a low or medium value in terms of Green Belt quality given its current use.

## *6. Agricultural land*

The site is non-agricultural land with no prospect of reinstating any agricultural use for practical and economic reasons due to its historic use in a commercial capacity. As such, Epping Forest District Council should prioritise the allocation of sites such as High House Farm before seeking to allocate greenfield/Green Belt land that is used in an agricultural capacity.

## *7. Enable small scale sites in smaller rural communities to come forward where there is a clear local need which supports the social and economic well-being of that community.*

Although the proposals relate more directly to higher tier development within draft Policy SP 2, the proposals will also make a positive contribution in a rural community.



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Therefore, the merits of the site, when assessed against the criteria under Policy SP 2, mean that it should be formally allocated for housing above many of the identified options in the draft Local Plan.

Policy SP2 proposes allocations for up to 175 dwellings in “small villages” which include: Coopersale, Fyfield, High Ongar, Lower Sheering, Roydon and Stabbleford Abbots. The identification of Stapleford Abbots as a sustainable smaller settlement to support growth further supports the case for the allocation of the land at [REDACTED] for residential development. The site constitutes a suitable and deliverable development opportunity within a sustainable smaller settlement.

Q7: Policy SP2 is currently unsound as it is not justified, positively prepared or effective. This policy should allow for allocation of the land at [REDACTED] for residential development of up to 30 dwellings.

## Policy P12 Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sheeting and Stapleford Abbots

Q6: This policy should be amended to include land at [REDACTED] as a residential allocation for up to 30 dwellings. A site location plan and a sketch layout are attached.

The site previously comprised a group of commercial buildings set back from the main road and a detached house closer to Stapleford Road. The site benefits from an extant planning permission for 7 large executive dwellings under planning application references [REDACTED] and [REDACTED]. A later planning permission was granted for 8 executive dwellings, inclusive of a replacement farmhouse, but this has now lapsed (ref: [REDACTED]). [REDACTED] are now working with the owner of the site to bring forward a scheme for up to 30 smaller dwellings based on a reduction in built footprint on the originally consented 7 and 8 unit schemes. A scheme for smaller units has been pursued as a result of the low demand for larger units and in light of the higher demand for smaller family housing units. It is proposed that the dwellings will be a mix of 2, 3 and 4 bedroom properties, which accords with the identified need as set out in the Council’s latest Strategic Housing Market Assessment (SHMA) (2015). A scheme with a greater number of dwellings will make a greater contribution towards the Council’s housing supply requirements. Furthermore, through providing an increase quantity of smaller units on site, Stonebond will be able to deliver a more efficient use of land that will enable the provision of much needed affordable housing on site that would otherwise be missed on rural sites.

Proposals to increase the number of dwellings on the site were subject of initial pre-application discussions with the Council in 2016 and following the refinement of the scheme the site has been the subject of a further request for pre-application advice. At the time of writing, the pre-application response in relation to the latest scheme is outstanding with positive engagement with officers ongoing.

The illustrative layout plan shows that the proposed redevelopment would be well contained and would include significant boundary planting and enhancements to improve the site’s Green Belt setting, providing enhanced integration within the local landscape than the previous proposals. As the landowner controls





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extensive additional land surrounding the area, a detailed landscape planting scheme will be incorporated within the delivery of the site to ensure that the visibility of development is limited in the wider landscape.

Given the planning status of this site, it should be formally removed from the Green Belt and allocated as a development site. The latest proposals seek to make effective re-use of this previously developed brownfield site to provide much needed smaller scale housing, which is best placed to meet local demand.

Q7: This policy should be amended to add [REDACTED] Stapleford Abbots as a residential allocation for up to 30 dwellings, with the text at B(vi) amended as follows (our inserted text is underlined for ease of reference):

“.....

*(vi) STAP.R1 Land at Oakfield Road – Approximately 33 homes; STAP.R2 Land to rear of Mountford and Bishops Brow, Oak Hill Road - Approximately 8 homes; STAP.R3 Land at The Drive – Approximately 6 homes; STAP.R4 land at [REDACTED] Stapleford Abbots – Approximately 30 homes (Stapleford Abbots).”*

## Policies Map: 5.24 Site Allocations in Stapleford Abbots

Q6: For the reasons set out in our response to Policy P12, land at [REDACTED], Stapleford Road, Stapleford Abbots should be included as a residential allocation for up to 30 dwellings.

Q7: The Policies Map should be amended to include the land at [REDACTED], Stapleford Road, Stapleford Abbots, [REDACTED]

## Summary and Conclusions

As set out within this representation, we object to the policies pertaining to Spatial Development Strategy (SP2), Smaller Villages (P12) and the policies map (5.25 – site allocations in Stapleford Abbots). It is against this background that we request the Local Plan is amended. We trust that the above comments will be considered as the draft Local Plan is progressed and would welcome attending and contributing to the Examination.