
Stakeholder Reference:
Document Reference:

Part A

Making representation as Agent on behalf of Landowner or Land Promoter

	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	Stephen	Philip
Last Name	Biart	Copsey
Job Title (where relevant)		Partner
Organisation (where relevant)	[REDACTED]	David Lock Associates
Address	[REDACTED] [REDACTED] [REDACTED]	50 North Thirteenth Street, Central Milton Keynes, MK9 3BP
Post Code		MK9 3BP
Telephone Number	[REDACTED]	01908 666276
E-mail Address	[REDACTED]	pcopsey@davidlock.com

Part B

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph:

Policy: SP 2 Spatial Development Strategy 2011-2033

Policies Map:

Site Reference: None of the above

Settlement:

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: Yes

Sound: No

If no, then which of the soundness test(s) does it fail? Positively prepared
Complies with the duty to co-operate? Don't Know

Please give details either 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; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible. Please use this box to set out your comments.

TFP maintain their technical objection to the basis for the identification of 11,400 homes as the Objectively Assessed Need (OAN) for Epping Forest District.

The 2017 SHMA update outlines the many and various assessments of demographic that have been made in bringing forwards the Housing Market Assessment over the period of plan preparation. This concludes that based on an interim demographic update, a OAN of 12,573 homes exists.

TFP maintains that there are grounds for considering higher numbers:

- The projection forward of previous suppressed trends in household formation and migration;
- The failure to take account of the impact of growth pressures and unmet housing needs from London;
- the treatment of population within institutional housing; and
- the manner in which uplifts for market signals and employment requirements are applied.

The Planning for the Right Homes in the Right Places consultation published a Housing Need Data Consultation table. This suggests that application of the proposed standardised methodology would lead to an annualised housing requirement of 923 dwellings per annum, compared to the current 518 dwellings per annum (although in theory as the plan is to be submitted before the 31 March 2018 these figures would not apply).

TFP consider that given the need to identify long-term boundaries to the Green Belt, every effort should be made to ensure a soundly based OAN.

Please set out what change(s) you consider necessary to make the Pre Submission 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 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.

On the basis of the updated evidence base, TFP consider that the starting point for a soundly-based OAN should be the figure of 12,573 dwellings for the period 2011-33, as opposed to the 11,400 dwellings used within the Submission Local Plan.

If your representation is seeking a modification, do you consider it necessary

to participate at the oral part of the examination?

Yes, I wish to participate at the oral part of the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

In order that client views are properly represented.

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph:

Policy: SP 2 Spatial Development Strategy 2011-2033

Policies Map:

Site Reference: None of the above

Settlement:

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: Yes

Sound: No

If no, then which of the soundness test(s) does it fail? Effective

Complies with the duty to co-operate? Yes

Please give details either 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; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible. Please use this box to set out your comments.

TFP support the approach to the distribution of growth within the District and the emphasis that this places on the main settlements as sustainable locations for growth. TFP consider there is scope for additional growth to be directed to these locations to provide a modest uplift on current allocations to ensure that settlements contribute towards meeting a properly assessed OAN.

TFP support the spatial distribution and direction of growth to Epping, and concur that the South Epping Master Plan Area (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).

TFP note the requirement to accord with infrastructure requirements established through the Infrastructure Delivery Plan (IDP) at criterion G. Firstly, the IDP is a live document intended to be updated on an annual basis, and therefore subject to change over time. Secondly, the IDP categorises infrastructure as either critical, essential or desirable. Thirdly,

in line with our representations to Policy D1, Policy SP2 should note that in areas subject of Strategic Master Plans such as SEMPA that the delivery of infrastructure will be coordinated by the Local Planning Authority to ensure that sites contribute collectively, equitably and proportionally.

Please set out what change(s) you consider necessary to make the Pre Submission 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 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.

Criterion G should be reworded to make clear that development proposals should accord with infrastructure requirements established through the more recent Infrastructure Delivery Plan, and should be considered in the light of Strategic Master Plans and other policies of the Plan.

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

Yes, I wish to participate at the oral part of the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

In order that client views are properly represented.

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph:

Policy: SP 3 Place Shaping

Policies Map:

Site Reference: None of the above

Settlement:

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: Yes

Sound: No

If no, then which of the soundness test(s) does it fail? Effective

Complies with the duty to co-operate? Yes

Please give details either 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; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible. Please use this box to set out your comments.

TFP supports in principle the production of a Strategic Master Plan to shape the planning of the SEMPA, subject to flexibility in the scope of the strategic master plan (as recognised at paragraph 2.91). The recognition at paragraph 2.96 and Policy DM9 that such plans need only be 'capable' of being adopted Supplementary Planning Documents (i.e. not necessarily adopted as Supplementary Planning Documents) is also supported.

TFP however object to Figure 2.1 which notes that Strategic Masterplans will be adopted as SPD following the adoption of the Local Plan. There is an acknowledged existing shortfall in housing delivery and efforts are being made to 'frontload' the process of master planning to promote timely delivery. The Housing Implementation Strategy states:

'8.9 The Council is committed to discussing and commencing the production of Strategic Masterplans with relevant site promoters early in 2018 following the Publication of the Submission Local Plan. It is anticipated that the production of Strategic Masterplans will commence during 2018, enabling Outline Planning Applications to follow in late 2018 / early 2019, alongside the Examination and adoption of the Local Plan.'

TFP support the approach of preparing early applications to be submitted alongside the examination and adoption of the Local Plan. However, the requirement to adopt strategic masterplans post adoption of the Local Plan is inconsistent with this approach, and will not be effective in bringing sites forward.

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 as part of the planning process to avoid delays in bringing proposals forward given the urgent need for new housing.

Please set out what change(s) you consider necessary to make the Pre Submission 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 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.

Amendments should be made to Figure 2.1 to delete reference to the need for adoption of Strategic Master Plans as SPD, and a consistent approach to the matter should be provided across the Local Plan.

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

Yes, I wish to participate at the oral part of the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

In order that client views are properly represented.

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph:

Policy: SP 6 Green Belt and District Open Land

Policies Map:

Site Reference: None of the above

Settlement:

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: Yes

Sound: Yes

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

Complies with the duty to co-operate? Yes

Please give details either 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; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible. Please use this box to set out your comments.

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

TFP does have some detailed comments on the approach to Green Belt matters specific to site EPP.R2 which are dealt with in our representations to Policy P1.

Please set out what change(s) you consider necessary to make the Pre Submission 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 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.

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 oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph:

Policy: SP 7 The Natural Environment, Landscape Character and Green and Blue Infrastructure

Policies Map:

Site Reference: None of the above

Settlement:

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: Yes

Sound: Yes

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

Complies with the duty to co-operate? Yes

Please give details either 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; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible. Please use this box to set out your comments.

TFP 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 South Epping Master Plan Area (SEMPA). This will include new connected green spaces that will promote a range of recreational opportunities alongside other green infrastructure uses to provide alternatives to the Epping Forest SAC and Lee Valley SPA.

Please set out what change(s) you consider necessary to make the Pre Submission 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 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.

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 oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph:

Policy: H 1 Housing mix and accommodation types

Policies Map:

Site Reference: None of the above

Settlement:

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: Yes

Sound: No

If no, then which of the soundness test(s) does it fail? Justified

Complies with the duty to co-operate? Yes

Please give details either 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; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible. Please use this box to set out your comments.

POLICY H1 requires all new houses to be accessible and adaptable as defined by the Building Regulations. TFP object to the blanket application of this approach. No formal evidence is put forward to justify this level of provision.

Please set out what change(s) you consider necessary to make the Pre Submission 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 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.

TFP consider that a more proportionate response would be to identify an appropriate

percentage of provision of accessible and adaptable dwellings.

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

Yes, I wish to participate at the oral part of the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

In order that client views are properly represented.

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph:

Policy: H 2 Affordable housing

Policies Map:

Site Reference: None of the above

Settlement:

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: Yes

Sound: No

If no, then which of the soundness test(s) does it fail? Justified

Complies with the duty to co-operate? Yes

Please give details either 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; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible. Please use this box to set out your comments.

POLICY H2 requires all new houses to meet accessible and adaptable standards as defined by the Building Regulations. TFP object to the blanket application of this approach. No formal evidence is put forward to justify this level of provision.

Please set out what change(s) you consider necessary to make the Pre Submission 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 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.

TFP consider that a more proportionate response would be to identify an appropriate percentage of provision of accessible and adaptable dwellings.

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

Yes, I wish to participate at the oral part of the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

In order that client views are properly represented.

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph:

Policy: T 1 Sustainable transport choices

Policies Map:

Site Reference: None of the above

Settlement:

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: Yes

Sound: No

If no, then which of the soundness test(s) does it fail? Effective, Consistent with national policy

Complies with the duty to co-operate? Yes

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TFP support the thrust of this policy, but is concerned that there is a risk of ambiguity in the present wording: Criterion C (iv) notes that development proposals will be permitted where they do not result in 'unacceptable increases' in traffic generation or compromise traffic safety. Criterion F(i) notes that development will be permitted if it does not result in cumulative severe impact on the operation and safety of, or accessibility to, the local or strategic highway networks.

Please set out what change(s) you consider necessary to make the Pre

Submission 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 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.

Change Required: TFP consider that criterion C(iv) should be deleted, and the Criterion F(i) should refer to residual cumulative severe impacts in line with paragraph 32 of the NPPF.

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

Yes, I wish to participate at the oral part of the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

In order that client views are properly represented.

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph:

Policy: DM 2 Epping Forest SAC and the Lee Valley SPA

Policies Map:

Site Reference: None of the above

Settlement:

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: Yes

Sound: No

If no, then which of the soundness test(s) does it fail? Effective

Complies with the duty to co-operate? Yes

Please give details either 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; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible. Please use this box to set out your comments.

TFP recognises the need for development to assist in the conservation and enhancement of the Epping Forest Special Area for Conservation (SAC). TFP is willing to consider appropriate and justified financial contributions to access management in line with Draft Policy DM2.

However, TFP is concerned that there is insufficient clarity in the policy wording regarding the provision of meaningful proportion of natural green space, or access to natural green space or the requirement for financial contributions. A consistent approach to this matter is required to be applied to all relevant allocations across the District.

Please set out what change(s) you consider necessary to make the Pre Submission 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 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.

Greater clarity is required in the policy wording regarding the provision of meaningful proportion of natural green space, or access to natural green space or the requirement for financial contributions. A consistent approach to this matter is required to be applied to all relevant allocations across the District.

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

Yes, I wish to participate at the oral part of the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

In order that client views are properly represented.

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph:

Policy: DM 5 Green and Blue Infrastructure

Policies Map:

Site Reference: None of the above

Settlement:

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: Yes

Sound: No

If no, then which of the soundness test(s) does it fail? Effective

Complies with the duty to co-operate? Yes

Please give details either 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; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible. Please use this box to set out your comments.

TFP object to the wording at criterion B(i) regarding the retention and protection of trees. This should be amended to be consistent with policy DM1 (F) which notes that loss will only be permitted where the need for and benefits of development can be demonstrated to clearly outweigh the loss.

Please set out what change(s) you consider necessary to make the Pre Submission 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 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.

The wording should be amended to be consistent with policy DM1 (F) which notes that loss will only be permitted where the need for and benefits of development can be demonstrated to clearly outweigh the loss.

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 oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph:

Policy: DM 20 Low carbon and renewable energy

Policies Map:

Site Reference: None of the above

Settlement:

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: Yes

Sound: No

If no, then which of the soundness test(s) does it fail? Effective

Complies with the duty to co-operate? Yes

Please give details either 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; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible. Please use this box to set out your comments.

TFP 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 insufficiently clear. 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.

Please set out what change(s) you consider necessary to make the Pre Submission 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 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.

The requirement for Strategic Master plans to 'demonstrate how the potential to incorporate infrastructure for district heating can be provided' should be revised to opportunities for district heating should be considered.

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 oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph:

Policy: P 1 Epping

Policies Map: Yes

Site Reference: None of the above

Settlement:

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: Yes

Sound: No

If no, then which of the soundness test(s) does it fail? Effective

Complies with the duty to co-operate? Yes

Please give details either 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; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible. Please use this box to set out your comments.

1. TFP control land that forms allocation EPP.R2, part of the South Epping Masterplan Area (SEMPA). TFP 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.

2. In this regard TFP note that the Sustainability Appraisal at Appendix V identifies the southern expansion of Epping as a More Suitable Strategic Option. TFP objects to the findings of the Green Belt Review: Stage 2 that parts of its land control would have a very high "summary of harm" upon the Green Belt if released. TFP concurs with the justification within the Sustainability Appraisal provided that the Green Belt study is inconsistent and that the land concerned makes only a limited contribution to the overall setting of the town. TFP also consider that impacts on the Green Belt, the historic environment and landscape can be appropriately managed by sensitive design. To this end, TFP has commissioned a Landscape and Green Belt Appraisal of the wider EPP R.2 allocation which is submitted in support of these representations.

3. TFP would note that in reviewing Green Belt boundaries, land under the control of third parties to the east of the proposed allocation EPP R.2 might also be removed from the Green Belt up to the tree-lined access road to Coopersale School which could provide a suitable defensible boundary.

4. Site EPP R.2 comprises agricultural land identified as Grade 3b (see attached MAFF Agricultural Land Classification Map).

5. Site EPP R.2 represents a sustainable and deliverable expansion to the town.

6. Site EPP R.2 is largely unconstrained in terms of landscape, agricultural land quality, flood risk, ecology, air quality, noise, existing infrastructure or ownership.

7. TFP has assembled comprehensive information on the site covering the following matters:

- Ecology - This confirms that the site has limited ecological value. The main ecological interest lies in the streams and woodland . Further survey work is recommended in respect of grassland habitats, roosting, foraging and commuting bats, great crested newt and reptiles and other species. Opportunities exist to significantly enhance the ecological value of the Site and provide a number of net gains in terms of biodiversity.
- Arboriculture - The tree survey identifies trees and associated root protection areas of trees considered worthy of retention including trees subject of Tree Preservation Orders.
- Noise and Vibration Assessment - An assessment has been undertaken of the implications of noise and vibration confirms that the majority of the site can achieve an appropriate internal noise environment using conventional design. Specific mitigation will be required for areas close to the railway and the M25, including the orientation and design of development.
- Landscape and Green Belt - The Landscape and Green Belt Appraisal submitted demonstrates that the allocation could be successfully developed for residential development, integrated within the existing context of Epping and assimilated into the surrounding landscape without causing wide scale change to landscape character and visual amenity. The proposed realigned Green Belt Boundary would be clearly defined, using physical features of the existing tree belt and field boundaries that are readily recognisable and would be permanent.
- Surface Water Strategy Note - The development site is located within Flood Zone 1, and is located outside any Source Protection Zone (SPZ). Mapping indicates that the site is underlain by London Clay Formation which is unlikely to allow the use of infiltration techniques. SuDS will be implemented throughout the development in order to provide source control and attenuation of surface waters whilst also providing water quality and bio diversity enhancement. Surface water runoff will be attenuated to the relevant standards and will be designed to avoid any increase in the risk of flooding elsewhere. Foul water networks of appropriate capacity exist nearby. The site is therefore presented as suitable in terms of flood risk and compliant with the criteria set out in the NPPF.
- Transport - Initial assessments have been undertaken on the surrounding highway network including a review of on-street car parking, which confirm the ability to make improvements to local highway infrastructure including opportunities for improving access along Brook Road and providing site access, along with the opportunities for connecting into utilities. With regard to access from Brook Road a number of options for site access are possible. Allied with measures within the existing highway the potential exists to manage road space more effectively and provide improved car parking and other localised improvements to provide benefits for existing residents and an appropriate standard of access to the new development. In terms of broader site accessibility, the proximity to the town centre and to Epping Station give excellent opportunities for a range of sustainable transport modes to be encouraged, which aligns with ECC requirements on sustainable

growth. Further measures are also under consideration including a shuttle bus service, discounts on bus tickets, the use of School Travel Plans, and a Car Share Scheme / Car Club. In terms of vehicle access initial assessment shows that the effects of the proposed development are modest and a range of options exist to provide appropriate improvements.

8. The inclusion of Brook Road Recreation Ground within allocation EPP.R2 allows for an enhanced alternative highway access linking towards Bower Hill. Any open space lost would be re-provided elsewhere on the site in addition to full new provision in line with Local Plan standards to create an improved long-term facility and significantly enhanced open space and recreation offer in this part of Epping. This would also offer the opportunity for ancillary facilities such as car parking and changing facilities etc.

9. TFP are committed to working with the other landowners within SEMPA (see attached letter) 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 a long-term defensible Green Belt boundary
- iii. New recreational and habitat provision that takes recreational pressure off Epping Forest.

10. TFP endorse the identification of a SEMPA for around 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.

11. 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. TFP 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 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.

12. TFP note the content of the Infrastructure Delivery Plan. Noting that this is a live document, TFP reserve the right to make further comments on its content as the Strategic Master Plan for SEMPA evolves, and as further iterations are made to the Infrastructure Delivery Plan.

13. TFP 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. There is an acknowledged existing shortfall in housing delivery and efforts are being made to 'frontload' the process of master planning to promote timely delivery. The Housing Implementation Strategy states:

'8.9 The Council is committed to discussing and commencing the production of Strategic Masterplans with relevant site promoters early in 2018 following the Publication of the

Submission Local Plan. It is anticipated that the production of Strategic Masterplans will commence during 2018, enabling Outline Planning Applications to follow in late 2018 / early 2019, alongside the Examination and adoption of the Local Plan.'

14. TFP support the approach of preparing early applications to be submitted alongside the examination and adoption of the Local Plan. However, the requirement to adopt strategic masterplans post adoption of the Local Plan is inconsistent with this approach, and will not be effective in bringing sites forward.

15. 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 as part of the planning process to avoid delays in bringing proposals forward given the urgent need for new housing. It is suggested therefore that the word 'formally' be deleted from Criterion J.

16. TFP 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 an increasing proportion of home workers. The requirement to include employment could prove problematic to deliver alongside other domestic and neighbourhood uses and is also likely to be of such a small scale that it fails to generate market interest.

17. TFP 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. This should be reflected in policy wording.

18. The SEMPA will deliver comprehensive supporting infrastructure and uses. TFP support the recognition at Criterion E that development proposals must contribute proportionately to the delivery of strategic infrastructure, including other sites in and around Epping.

19. TFP object to the detailed wording of the policy in that it should be explicit that:

- i. Other site allocations within Epping and other windfalls will be required to make appropriate contributions to strategic infrastructure such as education, 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.

20. 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.

21. TFP consider that the SEMPA can be developed from either end towards the middle and need not be the subject of any artificial phasing.

22. TFP 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.

23. TFP 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.

24. 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). TFP 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.

25. TFP note that other representations to the SEMPA, including site-specific matters, can also be submitted separately by other parties within an interest in the SEMPA.

Please set out what change(s) you consider necessary to make the Pre Submission 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 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.

It is suggested that the word 'formally' be deleted from Criterion J.

Criteria K (ii) should instead refer to the potential for employment to be created as part of the new neighbourhood centre and education uses.

The policy at K (iv) should, instead, refer to safeguarding suitable land for health facilities if they are shown to be required.

Criterion E should be clear that:

- i. Other site allocations within Epping and other windfalls will be required to make appropriate contributions to strategic infrastructure such as education, 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.

Criterion K (vi) should refer to a new bridge over the railway line to support pedestrian, cycle and potentially vehicular access.

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

Yes, I wish to participate at the oral part of the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

In order that client views are properly represented and as site promoter in order to ensure that the Inspector is fully informed on relevant matters.

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph:

Policy: D 1 Delivery of Infrastructure

Policies Map:

Site Reference: None of the above

Settlement:

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: Yes

Sound: No

If no, then which of the soundness test(s) does it fail? Effective

Complies with the duty to co-operate? Yes

Please give details either 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; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible. Please use this box to set out your comments.

TFP object to the lack of clarity regarding the opportunity to pool contributions subject to the relevant statutory restrictions. While this is alluded to at paragraph 6.13, the policy wording would benefit from greater clarity regarding the need for appropriate contributions from all relevant development proposals to infrastructure that serves more than just a single site, consistent with wording related to Garden Town Communities to contribute collectively, equitably and proportionally. Further, where a facility that serves a wider catchment is provided, the policy should also note that account will be taken of the provision of serviced land in reaching a view on an equitable contribution.

Please set out what change(s) you consider necessary to make the Pre Submission 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 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.

The policy wording should be clear that infrastructure that serves a wider area should be funded by other developments that benefit from that infrastructure, and that account should be taken of the provision of land in reaching a view on an equitable contribution.

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 oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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

Yes

Signature: [REDACTED] Date: 29/01/2018

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Epping Forest District Council
Postmaster@Eppingforestdc.gov.uk