

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	Adam	Julian
Last Name	Dias	Williams
Job Title (where relevant)		Director
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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: Epping

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.

Our client supports the spatial development strategy set out in Policy SP2 which seeks to allocate 1305 dwellings to Epping. Epping is a significant settlement within the District and its growth will enhance the town. The sequential approach for allocating greenfield green belt sites is supported. The South of Epping Masterplan Area is in accordance with this approach and its allocation is clearly justified by this.

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 3 Place Shaping

Policies Map:

Site Reference: None of the above

Settlement: Epping

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

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Our client supports the principle of a strategic masterplan for South of Epping provided that there is flexibility.

Paragraph 2.96 sets out that strategic masterplans should be capable of adoption as supplementary planning guidance. Whilst it is agreed that they should be produced to a high standard including public engagement, if formal adoption was to become a policy requirement our client would consider the policy to be unsound on the basis that it is likely to cause delays to bringing the proposals forward, which would make the plan not effective in delivering development

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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: Epping

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

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The need to amend the green belt boundaries to accommodate the proposed development, including to the South of Epping is supported.

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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: Epping

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

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Our client supports draft Policy SP7 which sets out that the Council will expect all development proposals, where appropriate, to contribute towards the delivery of new green and blue infrastructure which develops and enhances a network of multi-functional green and blue assets. This will be promoted as part of the South Epping masterplan area.

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.

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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: Epping

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

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The requirement for strategic masterplans to demonstrate how the potential to incorporate infrastructure for district heating can be provided is unsound as it is not justified. As set out in the representations submitted jointly by the landowners within South Epping Master Plan Area (SEMPA), 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.

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Omit requirement D for strategic masterplans to demonstrate how the potential to incorporate infrastructure for district heating can be provided.

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REPRESENTATION

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

Paragraph:

Policy: P 1 Epping

Policies Map:

Site Reference: EPP.R1

Settlement: Epping

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

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Our client supports the aspiration for Epping to support an appropriate level of growth to continue in its role as one of the main towns within the District. The level of housing proposed is appropriate and achievable during the plan period.

Our client owns part of site EPP.R1, which forms part of the South Epping Masterplan area which, together with EPP.R2, is identified for 950 new homes. For information, their site is shown on the attached plan (shown in pink, the areas in green and the area marked EX793576 have been sold off separately) and directly adjoins existing residential development along Ivy Chimneys Road. Our client's land within EPP.R1 is suitable, available and deliverable for residential development.

The designation of the South Epping Masterplan area is sound as it is a sustainable location within proximity to Epping London Underground Station, it's designation is therefore in accordance with the core principles of the NPPF.

The Council have submitted a comprehensive evidence base to support the site's designation. This includes a Green Belt Assessment by LUC and a site selection report by Nathaniel Litchfield & Partners. The site scores positively in the Site Selection Report with no harm to heritage assets and being within Flood Zone 1. The designation is therefore justified.

Joint representations have also been submitted by the landowners of the South Epping masterplan area. Our client supports the views put forward in these.

In particular, our client is happy with the principle of a masterplan but this needs flexibility in terms of how the number of houses are apportioned across the site and the phasing of the development. There is no need to require a certain number of houses to come forward per year as set out in the Infrastructure Delivery Plan, nor should there be specific phasing of the site, nor a requirement for the Council to formally adopt the masterplan.

Our client also objects to the need to provide employment development within the neighbourhood centre as other commercial, health and education uses will provide suitable employment opportunities. It is also agreed that the land for health facilities can only be safeguarded as it's delivery is dependent on the NHS.

Overall, the allocation of land to the South of Epping including the land show on the submitted site plan is sound as it is a result of a sequential process undertaken by the Council and is sustainably located as detailed in the evidence base,

However, some of the detailed working within the policy is not sound as it could hinder delivery of the proposals and must be reviewed carefully to ensure that the development is achievable within the plan period.

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In relation to 'South Epping Masterplan Area' Policy P1 should be amended to omit the requirement for employment development, omit the word 'formally' in relation to endorsement of the strategic masterplan and amend the requirement to 'safeguard land for health facilities'.

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:

The nature of these representations warrants oral discussion at the examination.

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

Yes

Signature: Julian Williams Date: 29/01/2018