

**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.**

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**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**

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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***

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**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 of Town and Parish Council  or

c) Landowner  or

d) Agent

Other Organisation (please specify)

## 2. Personal Details

Title

Mr

First Name

Adam

Last Name

Dias

Job Title  
(where relevant)

Organisation  
(where relevant)

Jenna Properties Ltd

Address Line 1

Unit 22 Bourne Court

Line 2

Southend Road

Line 3

Woodford Green

Line 4

Post Code

IG8 8HD

Telephone  
Number

020 8709 7940

E-mail Address

adam@miriad.co.uk

## 3. Agents Details (if applicable)

Mr

Julian

Williams

BB Partnership

Studio 33-34

10 Hornsey Street

London

N7 8EL

020 7336 8555

j.williams@bbpartnership.co.uk

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

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

|           |   |        |  |              |                |
|-----------|---|--------|--|--------------|----------------|
| Paragraph | 2.76- 2.80<br>2.81- 2.87<br>2.133- 2.145<br>2.146- 2.153<br>4.140- 4.148<br>5.8- 5.23 | Policy | SP2<br>SP3<br>SP6<br>SP7<br>DM20<br>P1 | Policies Map | 2.5<br><br>5.1 |
|-----------|---|--------|--|--------------|----------------|

|                |                   |            |        |
|----------------|-------------------|------------|--------|
| Site Reference | EPP.R1,<br>EPP.R2 | Settlement | Epping |
|----------------|-------------------|------------|--------|

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

**Proposed common representations to be submitted jointly by Landowners within South Epping Master Plan Area (see attached South Epping Master Plan Area Memorandum of Understanding and accompanying plan South Epping Masterplan Area and Land Ownership – 206263 DWG100)**

South of Epping Master Plan Area (SEMPA) represents a sustainable and deliverable expansion to the town. The Landowners (the Fairfield Partnership, Mr M Annett and Ms J Hillan, Jenna

Properties and Mr John and Mrs Gillian Padfield (the Owners)) 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.

### SP2 Spatial Distribution Strategy

The Landowners support the spatial distribution and direction of growth to 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).

### SP3 – Place Shaping

The Landowners 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.

### 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 therefore fully supported.

### Policy SP7 The Natural Environment etc

The Landowners support the objective to protect existing and provide new green and blue infrastructure, and will promote with the other landowner, a comprehensive approach in the 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. The Landowners are also willing to consider appropriate and justified financial contributions to the management to access management in line with Draft Policy DM2.

### Policy DM20 Low Carbon and Renewable Energy

The Landowners 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. 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 Central Line, it is considered that the ability to deliver one district heating scheme for EPP.R1 and EPP.R2 is highly unlikely.

### 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 general lack of constraint.

The owners are committed to working together 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 the SEMPA for 950 dwellings but would object to any fixed apportionment between R1 and R2, for fear this could unnecessarily constrain 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 Landowners do not agree with this level of delivery. Providing the Local Plan is progressed to adoption in a timely manner that an accelerated timescale for delivery will be possible. There is no basis for artificially constraining delivery once policy is in place such that development can come forward as soon as possible.

The Landowners 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 requests greater flexibility in the planning process. Therefore, it is suggested that word 'formally' be deleted.

The Landowners 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 Landowners 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 therefore instead make reference to safeguarding suitable land for health facilities.

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

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

1. 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.
2. 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 Landowners consider that the SEMPA can be developed from either end towards the middle, and need not be the subject of any artificial phasing. The Landowners 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 Landowner 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 Landowners note that improvements to off-site highways may require third party land controlled by the City of London (as Conservators of Epping Forest). The Landowners 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 Landowners note that other representations to the plan including site-specific matters will also be submitted separately by individual parties.

7. Please set out what changes(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.

No specific changes are proposed in these representations which are intended to set out the common views of Landowners within South Epping Master Plan Area. Further representations are being submitted by individual Landowners setting out in more detail their assessment of the Submission Plan and any suggested modifications required to make the Plan sound.

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

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

n/a

**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

Signature:

Date:

December 2017