

## **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="Troy Homes"/>	<input type="text" value="Phase 2 Planning"/>
Address Line 1	<input type="text" value="c/o Agent"/>	<input type="text" value="250 Avenue West"/>
Line 2	<input type="text"/>	<input type="text" value="Skyline 120"/>
Line 3	<input type="text"/>	<input type="text" value="Great Notley"/>
Line 4	<input type="text"/>	<input type="text" value="Braintree"/>
Post Code	<input type="text"/>	<input type="text" value="CM77 7AA"/>
Telephone Number	<input type="text"/>	<input type="text" value="01376 329059"/>
E-mail Address	<input type="text"/>	<input type="text" value="mcalders@phase2planning.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  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?

X

**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:

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:

Michael Calder

Date:

26/01/18

---



# Phase 2

PLANNING &  
DEVELOPMENT  
LIMITED

250 Avenue West  
Skyline 120  
Great Notley  
Braintree  
Essex  
CM77 7AA

01376 329059

[office@phase2planning.co.uk](mailto:office@phase2planning.co.uk)  
[www.phase2planning.co.uk](http://www.phase2planning.co.uk)

## **Epping Forest District Draft Local Plan 2018 Submission Version Response on Behalf of Troy Homes Ltd relating to Land at Bower Vale, Epping Site Allocation EPP.R9**

### **Introduction**

These representations to the Submission Draft Local Plan are submitted on behalf of Troy Homes, who have an interest in the proposed site allocation EPP.R9: land at Bower Vale, Epping. This site was previously identified in the 2016 consultation Draft Local Plan as an allocation for approximately 22 dwellings (ref: SR-0587) and is now identified as delivering approximately 50 dwellings (ref: EPP.R9).

The following sections will, in addition to outlining our support for the allocation of EPP.R9, also respond to matters raised within the Submission Draft Local Plan itself.

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

### **Policy P1 Epping (ix) EPP.R9 Land at Bower Vale – Approximately 50 homes**

Q6: We support the assertion that site viii SPP.R9 is an appropriate site for residential development, which follows positive pre-application discussion with the local planning authority during 2017. We note that the site is currently identified as delivering approximately 50 dwellings, however this should be amended to approximately 60 dwellings, to fully reflect the latest proposals of a minimum of 57 dwellings that have been supported through the pre-application process.

Redevelopment proposals for this site are at an advanced stage: a pre-application meeting took place in September 2017 (pre-application submission and response attached for information). Troy Homes intend to submit a planning application for this site in May 2018, enabling the delivery of this site within the five year plan period.

This representation site is located in a highly sustainable location and Troy Homes propose to make efficient use of this brownfield land in accordance with the National Planning Policy Framework. Further details in

relation to the proposals can be seen in the pre-application submission and are not therefore repeated here. However, in summary the pre-application process has determined that the site is suitable to accommodate 57 dwellings and will meet all planning standards or provide suitable mitigation for any flexibility sought.

Q7: The NPPF paragraph 154 states that Local Plans ‘should be aspirational but realistic.’ The policy as currently drafted is not efficient or justified as it fails to recognise the full development potential of the site and the aspirations of Troy Homes for a high quality high density development in this sustainable location. The Local Plan seeks to maximise opportunities for delivery of housing from previously developed land within the built up areas in order to minimise the need for Green Belt release. Accordingly, the policy should be amended to provide for a higher number of dwellings at the representation site, to better reflect the latest pre-application proposals, which have been supported by the Development Management team in terms of density and dwelling numbers.

#### **Policies Map: 5.1 Site Allocations in Epping**

Q6: For the reasons set out in our response to Policy P1 and Appendix 6: Site Specific Requirements for Site Allocations (EPP.R9), the allocation of land at Bower Vale (site ref: EPP.R9) is supported.

#### **Appendix 6: Site Specific Requirements for Site Allocations (EPP.R9)**

Q6: This identifies that the site on the at Bower Vale, Epping, which falls within the control of our clients, Troy Homes, as having an approximate net capacity of 50 dwellings. Our latest proposals for this site show that this site can comfortably accommodate 57 dwellings and this has been accepted by officer during the pre-application stage. The proposals are likely to be subject to some further modification to optimise the form of development from this site and may result in an increase in the overall number of dwellings and therefore our clients are seeking a revision to the overall number of dwellings on this site to reflect the greater development potential for this site. It is submitted that this site should be included within the Council’s five year supply of housing as it is fully deliverable within that period and it is the developer’s intention to deliver from 2019.

Appendix 6 of the Local Plan also provides commentary in relation to development requirements for each allocated site and our response in relation to this commentary is set out below:

Ecology: comments regarding the requirement for a contribution to access management and monitoring of visitors to the Epping Forest Special Area of Conservation are noted. The proposals are unlikely to increase the recreational pressures on Epping Forest because there are a number of existing alternative recreation and park areas within walking distance of the site. The developer would not object to the principle of making such contributions subject to an evidence based approach that these would pass the CIL Regulations.

Design: the document states that development proposals for this site should be considered and informed by the Quality Review Panel. Whilst we do not object to this approach, we would not wish to see this result in delays to the determination of a planning application on this site. The Plan does not specify when this Panel



## Phase 2

PLANNING &  
DEVELOPMENT  
LIMITED

will be set up and given that the submission of the application is programmed for May, we would not wish to see development of this site delayed whilst the Panel is being established. Notwithstanding these comments, we query whether this scheme, given its size and location, requires assessment by the Quality Review Panel, since the purpose of the Panel is to deal with larger and more significant proposals, such as strategic sites. Therefore to avoid potential disruption and delay during the application process later this year this requirement should be removed from the site.

Heritage: Comments regarding the need for an archaeological watching brief are noted.

On-site constraints: The Council identifies the proximity of the central line and adjacent industrial uses and the potential for impacts in terms of noise and air quality. The proposals will take these factors into consideration providing mitigation through careful design and layout.

Infrastructure: The Council recognises that the site is located within 400m of a London Underground Station and that the provision of on-site residents' car parking should be kept to a minimum. The draft scheme presented to the Council for pre-application discussions proposed a ratio of 1:1 ratio, which was considered acceptable by officers. Consideration will also be given to the provision of parking for visitors in light of officers' comments.

Troy Homes support the suggestion made for car clubs/car sharing or pooling arrangements on site, however the delivery of such a scheme will be dependent on the interest from an operator and the developer cannot be held by this requirement if no operator is brought forward. The policy should therefore be flexibly worded in this regard.

We query the need for a contribution towards Controlled Parking Zones in the vicinity of the site. The majority of the roads around the site have parking restrictions which restrict parking (primarily double yellow lines) and therefore the need for additional measures of designated residents' bays and permits is questioned. The Submission Draft Local Plan makes reference to the use of Controlled Parking Zones but does not give any details in terms of the proposed location of these Zones and therefore the Local Plan has applied a blanket policy approach and not identified the specific justification or evidence to support the need for this requirement.

Q7: In order to make this part of the Plan sound, the text should be amended as follows:

***“...Design***

~~*Development proposals for this site should be considered and informed by the Quality Review Panel.*~~

*...*

***Infrastructure***





## Phase 2

PLANNING &  
DEVELOPMENT  
LIMITED

*This site is within a 400m radius of a London Underground Station. To promote sustainable transport modes and encourage active transport, development proposals should limit the provision of on-site residents' car parking to that required to service the essential needs of the development. Provision should be made on-site for car clubs/car sharing or pooling arrangements, visitor parking and blue badge holders. ~~Contributions will be sought for implementing Controlled Parking Zones in the vicinity of the site.~~*

The text proposed for deletion is not justified or effective. This amended text will provide the flexibility required to ensure delivery the development proposals and will not be affected by unnecessary restrictions/controls.

We trust the above comments will be taken in to account as the draft Local Plan is progressed though Examination.