

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

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		MR
First Name		MARTIN
Last Name		FRIEND
Job Title (where relevant)		DIRECTOR
Organisation (where relevant)	WATES DEVELOPMENTS LTD	VINCENT AND GORBING LTD
Address Line 1	WATES HOUSE	STERLING COURT
Line 2	STATION APPROACH	NORTON ROAD
Line 3	LEATHERHEAD	STEVENAGE
Line 4	SURREY	HERTFORDSHIRE
Post Code	KT22 7SW	SG1 2JY
Telephone Number	01372 861000	01438 316331
E-mail Address		martin.friend@vincent-gorbing.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 STATEMENT: OBJECTION 1

(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.

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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:

TO ENSURE THIS ISSUE IS FULLY CONSIDERED AT THE EXAMINATION

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:

26/01/2018

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OVERALL HOUSING PROVISION

(Continue on a separate sheet if necessary)

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26.01.18

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SEE ATTACHED STATEMENT: OBJECTION 3

SPATIAL DEVELOPMENT STRATEGY

(Continue on a separate sheet if necessary)

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SEE ATTACHED STATEMENT: OBJECTION 4

HOUSING TRAJECTORY

(Continue on a separate sheet if necessary)

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SEE ATTACHED STATEMENT: OBJECTION 5

IMPACT ON EPPING FOREST

(Continue on a separate sheet if necessary)

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26.01.18

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SEE ATTACHED STATEMENT: OBJECTION 6

ALLOCATIONS AT EPPING

(Continue on a separate sheet if necessary)

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Yes

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No

Signature:

Date:

26.01.18

EPPING FOREST DISTRICT DRAFT LOCAL PLAN CONSULTATION

REPRESENTATIONS ON BEHALF OF WATES DEVELOPMENTS LIMITED

January 2018

These representations to the Epping Forest District Submission Local Plan ("SLP") have been prepared by Vincent + Gorbing on behalf of Wates Developments Limited ("Wates").

Summary

Wates consider the Submission Draft Plan to be unsound.

Most fundamentally, it does not meet the minimum reasonable legal requirements for plan preparation as the justification for the final selection of housing site allocations, many of which changed from the draft plan (November 2016) to the Submission Draft Plan, was not before the Council members in resolving to publish the plan and nor has this been made public during the consultation period on the SLP.

Not only is it unreasonable for the Council to make the decision they have without the due recourse to a comprehensive evidence base, but in publishing the SLP with such a fundamental part of the evidence base unavailable for public scrutiny, the Council are failing to legally comply with the Council's strategy for involving the community as embraced in their own Statement of Community Involvement (SCI); moreover the Sustainability Appraisal fails to properly evidence the reason for changes to the allocations between the draft plan and the SLP.

Indeed, Wates are of the view that the approach that the Council has taken leaves the plan-making process open to legal challenge due to an overall lack of transparency in the process, decisions made by elected Members without an evidence base before them, and critical information not available for scrutiny for respondents to properly respond to the Regulation 19 consultation. If the plan is submitted for examination now, without the Members having the evidence base on which to support its contents and without respondents having the ability to critically review the contents of the plan against the evidence base, there is a significant risk that judicial review will occur later in the process, frustrating the District Council's desire to have an adopted plan in place as soon as reasonably possible. Wates and a number of other participants in the plan making process have secured legal advice in this regard.

Moreover, Wates' reserve the right to make additional representations on the site assessment work once this is complete and published.

By reference to Wates' site at Epping, allocated in the Draft Local Plan (SR-0071) but not in the SLP, we will demonstrate that the allocations now proposed do not accord with the Council's own site selection process.

In relation to the substance of the plan, Wates will make the following case:-

- The overall housing requirement should be increased to meet FOAN and recognise market signals;
- Insufficient allocations have been made to ensure flexibility in delivery over the plan period;
- The spatial strategy is over-reliant on the strategic allocations at Harlow and fails to allocate sufficient sites at Epping;
- The five year requirement should be increased and further smaller sites allocated to meet this requirement;
- The Local Plan Strategy has failed to give sufficient weight to the impact on Epping Forest SSSI and Special Area of Conservation such that increased recreational pressures will result; in making allocations, the Plan has failed to address the need for alternative green spaces (SANGS) that will be needed to compensate for the increase in development in proximity to Epping Forest;
- The site allocations in Epping are unsound and will not deliver in accordance with the housing trajectory. The land at Stonards Hill should be re-instated as an allocation. We will demonstrate the overall deliverability and benefits of the proposal.

Objection 1 : Legal Compliance of the Plan as whole

Wates consider that the SLP is unsound as it does not meet minimum reasonable legal requirements of soundness. In particular, the evidence base on which the SLP is based is incomplete in a key area of the Plan – the housing and employment allocations.

The Report on Site Selection (issue v2 December 2017) explains how the Council's consultants went through a lengthy site selection process, taking account of other evidence including the SLAA, the Settlement Edge Landscape Sensitivity Study and the Green Belt Assessment, leading up to the publication of the Draft Local Plan in November 2016. The allocations in the Draft Local Plan were based upon this comprehensive evidence base and the evidence base was published at the time of the draft Local Plan to support the document.

Subsequent to the Draft Local Plan, the Council convened a Developers' Forum that met on a regular basis to discuss the way forward with the allocated sites, including entering into Planning Performance Agreements and the masterplanning of allocations. As an allocated site in the Draft Local Plan, Wates were invited to these meetings and participated in on-going discussions with Council officers. Although it was appreciated that the post Draft Local Plan period would see a further review of sites, this would be based on specific criteria, not a wholesale review of every allocation, and therefore the prospects were that it was unlikely that many sites would change between the Draft Local Plan and the Submission version.

Indeed, as explained in the *Report on Site Selection with Appendices A and D*, at Appendix A the Site Selection Methodology (SSM) published in September 2016 indicated that some changes were possible, based on consultation responses and

- *Findings from the Stage 2 Viability Study;*
- *Detailed assessment of transport impacts;*

- Updated information on infrastructure requirements/constraints;
- Level 2 SFRA.

The report made clear that :-

“Where there are clear planning reasons for altering the assessment (e.g. a change in planning circumstances, late identification of an error or new information arising from updated technical information), candidate Preferred Sites may be discounted and new sites identified for allocation in the Local Plan.”

In the event, substantial changes were made between the Draft Local Plan and the SLP, both in terms of the overall housing numbers allocated and in terms of the allocations themselves. At least 12 major sites were deleted from the draft plan, amounting to over 1,600 units. As an example, at Epping, *all* of the allocations outside of the urban area were deleted apart from the ‘South Epping’ sites, together with the St. Margaret’s Hospital site. This resulted in the deletion of six significant sites with a total of 795 units. The ‘South Epping’ allocation was increased by inclusion of a number of separate sites and with the yield rising from 546 units to 950 units. Yet the evidence base for these changes (and many other changes in allocations in other areas of the District) was not before the Members in December and is not available to the public at the time of this consultation.

The proposed SLP was put before all Members of the Council on 14 December 2017 with the resolution giving Members a choice to either :-

- (a) agree and publish the Epping Forest District Local Plan Submission Version 2017; or
- (b) Delay the Local Plan and accept the Government’s new housing delivery test requiring an indicative housing target of 923 homes per annum or 20,306 homes over the plan period.

At the time of the committee, the Report on Site Selection, December 2017 was available, but crucially, the appendices to the report that justified the allocations proposed in the SLP were not available to Members. The “clear planning reasons” for the changes, that the SSM indicated would be required to make changes to the draft allocations were not available for scrutiny. Various Members sought to question some of the allocations within the proposed plan and suggested changes to them. However, the Council’s legal adviser informed the Full Council that if any changes were made, these would be unsound as they would not be supported by the evidence base (including the Sustainability Appraisal) or the consultation period – and hence the timetable for submitting the plan to the Secretary of State – would be delayed, with the consequence for the overall housing requirement made clear in the resolution.

In their haste to approve the Submission Local Plan and commence the Regulation 19 consultation process, the Members were given no information as to why the final allocations had been chosen and had no opportunity to make any changes. The resolution was not therefore based on any evidence as to the acceptability of the proposed allocations, nor the reasons why some allocations had been deleted; the Members therefore did not have sufficient information on which to come to a reasonable decision.

The SLP was subsequently published for the Regulation 19 consultation. Yet still the evidence base on which to examine the soundness of the plan in relation to allocations now

proposed is not available. The appendices to the *Report on Site Selection* are unpublished with the main report, therefore the crucial *Appendix A Assessment of Residential Sites* and *Appendix C Settlement Proformas* are not available for scrutiny. Each appendix is described as being “....finalised at the time of publication. A final updated version of the *Report on Site Selection* will be published once the detailed write-ups have been completed.”

The Regulation 19 consultation is the last consultation prior to the Submission of the Plan to the Secretary of State – and the representations made at this stage are made available to the Inspector and form an important component in the Inspector considering the issues for Examination. Yet it is not possible to assess whether the Plan is sound as this element of the evidence base is unavailable. This is prejudicial to the ability of the consultees to make detailed comments on soundness and, indeed, contrary to the Council’s own Statement of Community Involvement which indicates that supporting studies which are used as background evidence to the Local Plan will be made available. They have not been.

Moreover, the significant changes to the draft plan are not evidenced by the Sustainability Appraisal. Whilst this looks at strategic options and changes between the draft and submission plans, it does not cross refer to the conclusions of the site assessment work (since that information is unavailable).

Accordingly, we consider that the SLP is unsound and it is not justified. Moreover, we do not consider that the plan should be submitted for Examination at this stage, and if it is there is significant risk that the process will later be subject to judicial review. The Council Members resolved to approve the plan for consultation without the evidence base on which to do so and could not have reasonably made this decision. The SLP is not legally compliant as the failure to publish a crucial part of the evidence base is contrary to the Council’s Statement of Community Involvement.

The Council claim that the information will be available to the Inspector once the plan has submitted for examination. However, fundamentally, this does not address the clear failure of the plan preparation process to both provide a sound basis for the Members to make the decision to publish the SLP and to allow consultation with a comprehensive evidence base.

Objection 2 : Policy SP2 – overall housing provision

Even by its own admission, the SLP will not meet Full Objective Assessed Housing Need (FOAN). The total of 51,100 across the Housing Market Area (HMA) relies on the Strategic Housing Market Assessment (SHMA) of 2015. As stated in the SLP, the most recent figure of July 2017 increases the requirement to 51,700, and suggests a requirement of 12,572 units in Epping. Even on the basis of its own evidence, the Council are proposing to under-provide housing against need by 1,173 units.

Moreover, as discussed at other examinations in the area, the West Essex and East Hertfordshire SHMA under-estimates the total housing requirement in the HMA.

The NPPG sets out that in assessing demographic-led housing need DCLG household projections form the starting point for the estimate of housing need, but that these may require adjustments to reflect future changes and local demographic factors which are not captured within the projections. The SHMA prefers a ten year migration trend on the basis that a longer term average is more robust than the shorter term migration trends the

household projections are based on. The 2014-based Sub National Population Projections (SNPP) which the CLG 2014-based household projections are based on (utilised in the SHMA), already assume a reduction in the rate of migration to 2033 when compared to the last five years. It has been demonstrated in other examinations in the area that by utilising the ten year migration trend the SHMA is under-estimating future household growth.

The market signals uplift applied in the SHMA is not supported by robust evidence that it would help to improve affordability as required by the NPPG. This is particularly an issue for Epping as the constraint on delivery is contributing to decreasing affordability. It is this trend that the Government's Housing White Paper is seeking to address by the introduction of a standardisation in approach to market signals. Whilst the emerging approach is not yet policy, it would clearly mean a substantial increase in the housing requirement to Epping – the precise reason that the Council have rushed through the plan to ensure it is submitted before the new methodology is introduced. Whilst in rushing through the plan they may avoid this necessity, it does nothing to help those in need of a home within the District.

The uplift for market signals in the SHMA of 20% is constrained to past migration, household formation rates and past average household size. This will not improve affordability. Nationally, there is evidence that delivery of housing above the household projections will need to be much greater to improve affordability. When considering the national picture (the Government has made clear the need to deliver at least 250,000 homes per annum) the Council's approach is unsound and is based on a SHMA that does sufficiently take account of all of the evidence that if affordability is not to worsen, housing must be delivered in excess of household projections. This has not fed into the proposed OAHN of the SHMA for Epping.

This approach is exacerbated by the significant reduction in overall allocations to each settlement set out in policy SP2 (see below) such that the flexibility to increase housing beyond the household projections, which was a feature of the Draft Local Plan, has, in the SLP been severely eroded.

Objection 3 : Policy SP2 : spatial strategy and overall allocation to Epping

The Spatial Development Strategy of the Plan is unsound for a number of reasons.

Reduction in the overall allocation to each settlement

The overall allocations to the settlements within the District (i.e. excluding Harlow), have been reduced from 7,300 units at draft stage to 5,916 units. The Council is therefore proposing a significant reduction in the amount of land to be allocated compared to the Draft stage, yet there have been no changes in circumstances or policy that would justify such a dramatic change.

Whilst the allocations as now proposed exceed the claimed requirement in Table 2.3 of 4,146 (compared to the target of 4,550 at draft stage), for the reasons set out above this requirement is unlikely to meet the need for housing in the district. Moreover, it is essential that whatever OAN is adopted, a significant excess in allocations compared to OAN is essential to address affordability and to ensure that the plan, once adopted is sufficiently flexible to react to rapid change (NPPF para. 14).

The reduction in the allocations compared to the target has not been justified; the Council has also removed all reference to ‘reserve sites’. At the time of the draft plan, the Council were clear that flexibility was essential to ensure that once the Plan is adopted, should allocated sites fail to deliver, housing need will still be met; and that *“This will also help to ensure that the Council can ensure that sufficient land can be made available to meet five year land supply requirements on an ongoing basis.”* (Draft Plan Figure 3.5).

This approach has been abandoned, yet the need for flexibility is more now than ever, given the direction of travel of Government policy (witnessed by the forthcoming introduction of the standardised methodology) and the national emphasis on building more homes than OAN.

Over concentration of development at Harlow

Firstly, there are, at the present time, doubts that the quantum of development allocated to Harlow is achievable as the infrastructure needed to support this level of development is yet to be fully assessed and costed. At 3,900 units, these allocations amount to over a third of the housing requirement of the plan. The developments rely on significant infrastructure including the improvements to junction 7 and a new junction 7a on the M11, improvements which are only partly government funded. Indeed, the infrastructure improvements will require pooling of contributions over several sites, and in the absence of the adoption of CIL, it remains uncertain whether or how this will be achievable.

Secondly, the Harlow Strategic Sites Assessment Report (AECOM, September 2016) makes optimistic assumptions regarding the absorption rates of the market in the vicinity of Harlow. Given the scale of development proposed, over such a confined area, we seriously doubt that delivery rates will be as high as assumed.

It is notable that since the Draft Plan, assumptions regarding when the Harlow sites will be developed have been altered, reflecting an on-going delay in the assumed delivery. At the time of the Draft Local Plan, three of the sites around Harlow were expecting to be delivering units by 2019 – 2020 (between them some 600 units in the first 5 years of the plan period) whilst East of Harlow was assumed to only commence delivery in 2030/31) yet was expecting to deliver 750 units over those three years.

Both of these assumptions were questionable and have now been revised. The Housing Trajectory assumes only 150 units from these sites in the period 2017 – 2022 but assumes by 2022 all three sites will be delivering units (350 p.a) with 400 units p.a. being delivered for seven continuous years 2023 – 2030. If the Council’s assumptions in respect of the Harlow allocations prove to be over-optimistic in terms of timing and rates of delivery, the result will be a serious shortfall against the OAHN requirement over the plan period as a whole.

In contrast, smaller sites such as the Wates site at Epping, can deliver with a much shorter lead-in time and should be the primary focus for delivery in the first five years of the plan period and add resilience to the plan by ensuring flexibility in delivery. .

Unsustainable distribution around the remainder of the district

The dispersed distribution of residential units across other settlements in the district will not achieve one of the key objectives of the plan – to ensure that development takes place in the most sustainable locations.

Leaving aside the development at North Weald Basset, some 1,550 new dwellings are proposed in 12 villages within the District. Of these, some 530 dwellings are proposed in settlements defined in the Settlement Hierarchy Background Paper (September 2015) as 'small villages' - being Coopersale, Fyfield, Lower Sheering, Nazing, Roydon, Stapleford Abbots, Sheering and Thornwood. In some cases, such as Thornwood (172 units), the proposed allocations represent an expansion of the settlement population by over 30%. The villages in EFDC (particularly the small ones) have limited local facilities and poor access to quality public transport and are not appropriate locations for the scale of development proposed in the SLP.

This approach is unsound and should be reviewed in order to direct more development into locations that are sustainable, namely the four main towns within the District (Chipping Ongar, Epping, Loughton/Debden, Waltham Abbey).

Sequential approach

We consider that the sequential approach that has guided the allocation process needs to be reviewed. In particular, the priority given to "Sites located on open space within settlements where such selection would maintain adequate open space provision within the settlement" is questionable. Even if open space provision is 'adequate' (however this might be defined), the loss of open space within settlements can have a significant impact on recreation, the amenity of residents and the character of settlements. In many cases, the loss of greenfield agricultural land on the edge of settlements is likely to be more appropriate, as sustainable, and have lesser impacts on the existing population.

Indeed, prioritising open space within settlements has resulted in the allocation of significant unit numbers on amenity space and playing fields in Loughton, despite the likelihood of objection from Sport England and significant concerns from the local communities that benefit from these spaces.

Objection 4 : paras. 2.59 – 2.63, appendix 5 and Policy SP2

The Council accept that there has been a significant shortfall in housing delivery compared to need for a considerable period. In the period 2011/12 – 2016/17, only 1,330 new dwellings were completed, compared to a requirement of 3,108 (based on the Council's requirement of 518 per year which is below OAN). A step change in delivery is clearly needed. Yet the plan proposes distributing the shortfall across the remainder of the plan period only providing 715 of the shortfall in the first five years. The Council's approach is driven by its reliance on the Harlow sites which will not start to deliver units until after 2021/2022. Yet the need to make up this shortfall more quickly is an urgent one and more sites that can be developed quickly should be allocated in the plan in order to meet this need.

Moreover, the assumptions regarding the delivery of some sites are unrealistic; in particular we consider the town centre allocations within Epping will be difficult to deliver in the short term (see below), and with the allocations now chosen, 267 units are unlikely to be delivered in the next 5 years.

Objection 5 : Policy DM2 and site allocations process : failure to fully consider the impact on Epping Forest

The plan has failed to give sufficient weight to the impact of development on the Epping Forest SSSI and SAC in the allocation process, and lacks any positive proposals for provision of 'Suitable Accessible Natural Green Space' (SANGS). We consider that the allocations that have been made lack any commitment to the provision of sufficient public open space to mitigate the recreational impacts of the volume of housing on the Forest. We consider that this is likely to frustrate the delivery of some developments, particularly those in closer proximity to the Forest and goes to the heart of soundness of the Plan.

This is particularly so for the allocations at Epping South. Indeed, the representations at the Regulation 18 consultation highlighted the considerable concerns of the Conservators of Epping Forest with the scale of development at Epping South and the potential recreational pressures that would result given the proximity of the site to the Forest. Yet, in direct conflict with this concern, the SLP increases the level of development in this location. The Policy P1 makes no requirement to provide 'Suitable Accessible Natural Green Space' (SANGS) within the development. In our view, unless a significant proportion of the development area were to be given to green space that is of a quality and type suitable to be used as mitigation for the impact on Epping Forest, the development is unlikely to be acceptable. This brings into serious question the capacity of the development, particularly given other constraints such as the need to maintain a buffer to the M25, overhead power lines, and the need for other infrastructure.

This should be compared with the option of development at Stonards Hill, which proposes a new Country Park [8.7ha.] which far exceeds the amount of public open space that would be needed to serve the population of the development itself; indeed, the Country Park would provide a resource for the town as a whole and would mitigate existing recreational pressures on Epping Forest.

Objection 6 : Policy P1 : Epping

The strategy for Epping is unsound as it is not justified, when considered against the reasonable alternatives. In particular, we object to the omission of the land at Stonards Hill, allocated at Draft stage but now removed. The site has been consistently considered and supported throughout the plan-making process, and should be re-instated as an allocation, comprising a new residential neighbourhood and country park.

The strategy of concentrating nearly all the development within the "Epping South" strategic extension is unsound; it is doubtful in its deliverability and is not as sustainable as development at Stonards Hill.

We also make comment on the deliverability – particularly in the short term – of the proposed town centre sites.

Consideration of Stonards Hill through the plan making process

Wates have participated in the Local Plan process for the last 10 years; accordingly, the evidence base has considered the land at Stonards Hill on a number of occasions and has consistently concluded that the site is suitable for development. Moreover, the site was

considered in the Community Choices consultation in 2013 and the public expressed their own views about the various potential greenfield allocations around Epping. The site ranked second out of the 8 sites considered, with 54% of respondents supporting the site, compared to only 40% supporting the land which has now been allocated at Epping South.

The site is in one ownership and is under option to Wates, a family development company that has a track record of delivering development in close collaboration with the local community. Wates will partner with a single housebuilder to provide a sustainable new neighbourhood and country park. The site would be delivered in the first 5 years of the plan – helping to address the manifest back log of housing that presently exists – in a sustainable location close to the town centre. There are no technical impediments to its delivery and a full suite of technical work has been undertaken.

Crucially, the vision for the land at Stonards Hill proposals 8.7ha. (21 acres) of new public open space in the form of a country park on land over which there is no right of way or access. As highlighted above, unlike other proposals (such as the land at Epping South) far from contributing to the additional recreational pressures on Epping Forest, the site will make a positive contribution to mitigating the wider development impacts of the Plan as a whole. Wates' vision document is attached to these representations,

Considering the evidence base further, the history of the positive contribution of the site to meeting housing needs in the area is as follows.

Strategic Housing Land Availability Assessment 2012

The Stonards Hill site (then with the number "SR-0071") was considered in the Strategic Housing Land Availability Assessment in 2012. The site assessment assumed that the site had a yield of 300 – i.e. the entire site from the edge of the urban area to Stonards Hill would be developed. Despite the level of development assumed (far more than was then proposed in the draft Local Plan), the SLAA considered the site as "Suitable" (outside of the current policy constraint of the Green Belt, available, achievable and deliverable. The overall summary of "Key factors affecting the site" in the summary tables within the assessment concluded that *"The site is suitable, but is within the Green Belt. A number of TPO's spread throughout the site and development may involve loss of trees but could be achievable with a very sensitive masterplan."*

Strategic Housing Land Availability Assessment 2016

The SLAA was published again in an updated form in July 2016. The assessment of the site was reviewed but no changes were made to the conclusions; the site was again considered suitable, achievable and deliverable. The summary assessment added a comment that *"The site is currently subject to an Option Agreement with Wates Developments Ltd but could be available for development in the future."*

The SLAA was carried out in parallel with a Green Belt review.

Stage 1 and Stage 2 Green Belt Review

The Green Belt Review Stage 1 was completed in September 2015. It undertook a high level review of Green Belt land across the District to identify the contribution of the Green Belt towards national Green Belt purposes as set out in the National Planning Policy Framework.

The review divided the district into land parcels. Following the high level review, a number of constraints were applied, including Strategic Flood Risk Assessment; Special Protection Areas; Special Areas of Conservation; Sites of Special Scientific Interest; Local Nature Reserved and City of London Corporation Epping Forest Buffer land. The review resulted in broad areas being identified as areas worthy of further assessment at stage 2 and each being scored against the national Green Belt criteria. The land at Stonards Hill was defined as parcel DSR-047 and score '5' – one of the lowest scores of all of the parcels assessed. On all but one of the four purposes of the Green Belt, the site scored "0" – i.e. it made no contribution and development would therefore have no adverse impact.

In terms of the contribution of the land to the purposes of the Green Belt, it was concluded that the site made no contribution to checking unrestricted sprawl; that its development would not lead to towns merging as *"strong defensible boundaries that would prevent Epping and North Weald Bassett from merging are created by the road Stonards Hill to the north-east and the EOR [railway] to the south east"* with the distance to the nearest settlement being established as 1.9km. It was further concluded that the site makes no contribution to preserving the special character of Epping *"Given that it has no physical or visual relationship with the historic core of Epping."* The only contribution identified was that the undeveloped status of the land assisted in safeguarding the countryside from encroachment.

The Stage 2 assessment in August 2016 broadly agreed with the stage 1 findings, although considered a 'weak' impact on the merging of neighbouring towns due to the narrowing of the gap with the village of Coopersale; and a 'weak' contribution to preserving the setting of the town due to its historic relationship with the Theydon Grove Estate. The overall impact of development on the Green Belt was considered to be 'high'.

However, this conclusion can be compared to the sites that have now been allocated for development. The land at South Epping West (now allocated as EPP.R1) scored 9 at the Stage 1 assessment (compared to 5 at Stonards Hill) and the Stage 2 assessment concluded that the resultant harm to the Green Belt from development would be 'very high' – i.e. greater than the land Stonards Hill. The development of both the northern part and southern part of the land at South Epping East (allocation EPP.R2) was also considered to have a 'very high' impact on the Green Belt.

In terms of the impact on the Green Belt therefore, the evidence base shows clearly that development of the land at Stonards Hill would have *less* impact on the Green Belt than the South Epping Allocations.

Arup Site Selection Process

The Arup site selection process considered the suitability of the Stonards Hill site. At the Stage 1 analysis it was concluded that there were no high level constraints that would prevent development.

"No on-site restrictions or constraints have been identified and there are no other constraints that have been judged as insurmountable."

The Stage 2 (suitability) and Stage 3 (deliverability) assessments were then undertaken. Again, the site scored well and, providing development was limited to the south west, the assessment concluded the site should be allocated. The suitability assessment scored 7 of

the 32 criteria positively, 13 as neutral and 11 as negative. This can be compared to the two Epping South sites; the Epping South (East) site scored only 3 positively, 17 as neutral and 11 as negative, whilst Epping South (West) scored only 2 positively, 18 as neutral and 11 as negative.

When the stage 3 (deliverability assessment) was undertaken, the Stonards Hill site again scored more favourably than the Epping South (west) site and equal with the Epping South (East) site. Out of the 20 criteria, Stonards Hill scored 9 criteria positively, 8 as neutral and 3 as negative, the same scoring as for Epping South (East). However, Epping South (west) scored only 5 criteria positively, 10 scored neutral and 5 scored negatively.

The deliverability assessment concluded on Stonards Hill:-

“This site was identified as available within the next five years. It has been marketed and has no identified constraints or restrictions which would prevent it coming forward for development. The site should be allocated.”

On the basis of this comprehensive evidence base, the site was allocated for development in the draft Local Plan.

As highlighted above, the site has now been removed at Submission Stage, and no evidence has been provided as to why this is the case. Wates consider this to be entirely unsound. The retention and expansion of Epping South is not justified by the evidence that has been published to date.

Conclusions on the acceptability of the Stonards Hill site given the evidence base

Throughout the comprehensive site assessment and Green Belt review process that the Council undertook in preparing their Local Plan, the Stonards Hill site scored well in comparison to other options (particularly Epping South) – See Table 1 below - and was allocated in the Draft Local Plan in November 2016 under policy Draft Policy P 1 – Epping (site SR-0071) with a yield of 115 homes. There is no justification for its removal and the SLP is unsound in this respect.

Table 1 : Summary of consideration of Stonards Hill compared to Epping South in the evidence base

	Stonards Hill SR-0071)	Epping South (East) (SR-0113A)	Epping South (West) (SR-0069/33)
SLAA -	Available, Achievable, Deliverable	Available, Achievable, Deliverable	Available, Achievable, Deliverable
Green Belt Review – purposes of the Green Belt			
1. Unrestricted sprawl	No contribution	No contribution	No Contribution
2. Preventing coalescence	Weak	Relatively weak	Moderate
3. Safeguarding countryside	Relatively strong	Strong	Strong
4. Preserving special character	Weak	Relatively weak	Relatively Strong
5. Assisting in urban regeneration	Not assessed	Not assessed	Not assessed
Site Selection Methodology			
Site suitability assessment (32 criteria)			
No. of (++) scores	1	1	1
No. of (+) scores	6	2	1
No. of 0 scores	13	17	18
No. of (-) scores	7	9	8
No. of (--) scores	4	2	3
N/A criteria	1	1	1
Site deliverability assessment (20 criteria)			
No. of (++) scores	0	0	0
No. of (+) scores	9	9	5
No. of 0 scores	8	8	10
No. of (-) scores	3	3	5
No. of (--) scores	0	0	0

Wates' vision for the Stonards Hill site

Prior to and since the publication of the draft Local Plan, encouraged by discussions with officers through the Developers' Forum, Wates have instructed a comprehensive suite of technical studies and prepared a Vision Statement to demonstrate how the land can be successfully brought forward for a development of new homes alongside an extensive Country Park. This Vision Statement is attached to these representations.

Detailed technical work has been undertaken on the key issues that will need consideration in bringing forward the site to deliver this vision; namely:-

- Ecology
- Trees
- Landscape capacity and impact
- Access and highways
- Utilities including drainage

This technical work has informed a design exercise to illustrate Wates' proposed vision for a new area for the community at Epping involving the creation of a significant new country

park with access for all in very close proximity to the town centre. This provides an opportunity to ensure that much needed housing is delivered with a public legacy for the future involving access to the countryside.

The country park, 8.7ha in area, will involve openly accessible land, orchards, allotments, and a network of paths linking the site to the wider countryside, managed for its recreational and biodiversity value. Alongside, the new neighbourhood would include around 130 new homes, including 40% affordable housing and homes aimed at first time buyers and downsizers, set in a high quality environment. Wates propose that the homes will be designed to reflect the local vernacular and will nestle within the undulating landscape with trees and hedgerows carefully and attractively integrated into the scheme.

The site is within easy walking distance of the town centre and railway station, reducing the need for residents to use cars. The main access would be by a carriage drive from Stonards Hill, ensuring that those that do need to use their cars are directly encouraged away from the town.

The Vision Statement provides compelling evidence as to the soundness of the allocation previously proposed by the Council.

Comments on other sites in Epping

Epping South

Wates do not consider that the Epping South development is sound.

Deliverability : prior to the allocation in the SLP, the land now embraced in the two Epping South allocations has been considered as discrete land parcels, reflecting the history of land promotion through the SLAA and the consideration of the land in the Site Selection Methodology process. Together, the Epping South masterplan area comprises 7 different (and in some cases) overlapping land parcels assessed in the SSM. Even within the land parcels, the SSM describes three of these land parcels as themselves being in multiple ownership. We consider that this will at best delay and at worse preclude the delivery of the South Epping Strategic Masterplan which the SLP requires to ensure the comprehensive delivery of the development. There is nothing in the evidence base which indicates that a comprehensive scheme can or will be brought forward.

Impact on the Green Belt : as discussed above, the Epping South allocations perform worse than Stonards Hill in terms of their impact on the Green Belt. The Stage 2 Green Belt study concluded that the impact of development on the Green Belt at Epping South (West) would be 'Very High' (compared to High at Stonards Hill) and made the following comments:-

"The parcel lies within the gap between Epping and Theydon Bois, which is approximately 1.2km wide at this point. Other features provides separation between the two towns (the M25 and land further south outside the parcel, including the woodland block). Development within the parcel would reduce the size of the gap and may increase the visibility/sense of relationship between the two towns due to the elevated and undulating topography within the parcel."

The parcel consists of an agricultural field and is currently undeveloped apart from a pylon. The existing Green Belt boundary is strong, with a clear definition to the urban edge of Epping provided by a vegetated stream. Despite the presence of the M25 as a potentially strong barrier feature, the elevated and undulating topography means that new development within the parcel is likely to be visible from the wider countryside.”

Similarly, development of the land in the northern part of Epping South (East) was also considered to have a Very High impact on the Green Belt

“The parcel consists of agricultural fields and a playing field, both surrounded by strong tree/hedgerow boundaries and is primarily undeveloped with the exception of a car park and building associated with the golf course in the far eastern part of the area. The existing Green Belt boundary with Epping’s urban edge is strongly defined by trees and Brook Road. The outer boundary of the parcel is also quite strongly defined (in the south east but less so in the south west) by trees along a stream, and topography, which rises to the south (outwards) and south east – forming a high point in the south eastern corner of the parcel. If the parcel were to be developed, the western boundary would require significant strengthening. Development within the parcel is therefore likely to result in a sense of encroachment into the wider countryside.”

Scale of development : we consider that the substantial increase in development proposed between the draft plan and the SLP is unachievable. There is no evidence that 950 units can be accommodated on the land given the constraints that exist such as the need to maintain a buffer to the M25, overhead power lines, and the substantial areas of land that will be required for significant community infrastructure. This is in addition to the lack of ability of the development to properly provide SANGS to mitigate the impact on Epping Forest, without which the development will clearly be unacceptable. Moreover, the development, being at the edge of settlement with a strong and defined character, is likely to require sensitive design and an appropriate density – with an emphasis on a high quality suburban character – and this will conflict with the level of development proposed.

Sustainability : the site is on the southern edge of Epping and is distant from the town centre. At its very nearest (the southern end of Bower Hill) the East allocation is 1.4km from the town centre. The route is uphill and unlikely to be attractive to pedestrians. The distance is greater to the West allocation and distances from within each part of the development will clearly increase. The railway station is approximately 750 – 1km distance from the edge of each of the development areas.

This has to be compared with the option of development at Stonards Hill. The site was the best located out of all proposed allocations in the Draft Local Plan outside of the existing settlement boundary, as it has excellent and direct sustainable links to the town centre (the High Street is less than 5 minutes’ walk) and local public transport. It is approximately a 400m (5 minute) walk to Epping Underground station and a 600m (8 minute) walk to the nearest bus stops

Impact on Epping Forest : as has already been highlighted earlier in our representations, there is a likelihood that the proposed allocations will result in recreational pressures on Epping Forest, and the Conservators of Epping Forest raised concerns with the scale of

development at Epping South at Regulation 18 stage. This potential impact has been exacerbated by the increase in the scale of development with no commitment to providing 'Suitable Accessible Natural Green Space' (SANGS) within the development. This should be compared with the option of development at Stonards Hill, which proposes a new Country Park (8.7ha.) which, as highlighted previously, will provide a resource for the town as a whole and would mitigate existing recreational pressures on Epping Forest.

Timescales for delivery : given the complexities regarding ownership, together with the scale of the development, the infrastructure set out in Policy P1 to support it, and the need to go through the masterplanning process, the development of Epping South will clearly make no contribution to the 5-year housing land supply. It will not therefore contribute to the step-change in housing delivery required in Epping Forest to deal with persistent under-provision in recent years.

Other sites in Epping

The housing trajectory suggests that 267 units will be delivered on new sites at Epping in the first 5 years of the plan. As Epping South will not make a contribution during this period, a significant proportion of the other 355 units presently allocated within Epping will need to be delivered during this period. For various reasons, the sites within the town are complex and are not certain to be delivered.

For example, the redevelopment of railway station car park (EPP.R3) will need to consider re-provision of parking in the first instance, maintaining access to the station for buses and other traffic, and considerable reconfiguration of access arrangements; given the need to provide decked car parking the scheme will include significant abnormal costs.

The land behind the Civic Centre (EPP.R8) will require the cessation of existing office uses to allow redevelopment. The SSM makes clear that the timescale for this is uncertain and the site will not be delivered in the first 5 years of the plan.

The Epping Sports Centre (EPP.R5) site will require the re-provision of the Sports centre and the Epping Library site (EPP.E11) will require the re-provision of the library. In both cases the site for the new facilities has not been identified, nor has the timescale for their replacement, which needs to occur prior to development commencing.













The Cottis Lane Car Park (EPP.R7) will require cessation of a public car parking use and its re-provision.

In summary, having removed so many sites – including the land at Stonards Hill – that were immediately deliverable, we do not consider that the trajectory in the Local Plan for Epping is realistic.



Land at Stonards Hill, Epping

The benefits of development

 <p>Visually Enclosed Site</p>	<p>The housing will be set within the lower slopes which means that it is visually enclosed</p>	 <p>Allotments & Community Orchard</p>	<p>Allotments will be a key community asset that the scheme will be providing.</p>	 <p>Kick-about</p>	<p>A key part of the scheme will be a publicly accessible amenity space at the heart of the scheme. This will be located at the flattest part of the site.</p>	 <p>Sustainable Location</p>	<p>The site facilitates easy access to the town centre and a range of facilities on foot or on bike</p>
 <p>Managing the Drainage across the site and beyond</p>	<p>A network of sustainable drainage corridors will permeate the scheme and lead to new attenuation ponds along the western edge of the valley</p>	 <p>Country Park</p>	<p>A major new park will wrap around the development. Significant open space will be provided alongside Stonards Hill</p>	 <p>up to 130 new homes</p>	<p>The scheme will offer the opportunity to create up to 130 new homes within walking distance of Epping town centre. These will be provided in a part of the country where the UK's housing crisis is at its most acute.</p>	 <p>up to 52 affordable new homes</p>	<p>Up to 52 genuine affordable new homes for young Epping families</p>
 <p>5 minute walk to Railway Station</p>	<p>Easy access to the railway station which is only 5 minutes walk to the south of the site and 2 minutes cycle.</p>	 <p>School Access</p>	<p>The existing primary school is within easy walking distance of the proposed housing</p>	 <p>£2.2m</p>	<p>Financial contributions of approximately £2.2m to the District and County Council through the New Homes Bonus</p>	 <p>£3.3m</p>	<p>Contributions through the Community Infrastructure Levy of approximately £3.3m *</p>

* anticipated CIL (once adopted) based on EFDC Draft Charging Schedule

Foreword

A new neighbourhood at Epping

1. The site
2. Constraints and opportunities
3. Design principles
4. The masterplan
5. Reflecting locality
6. Access strategy
7. Planning context

Consulting Team

Planning - Vincent & Goring
Landscape - Catherine Shelton Associates
Urban Design - Savills Urban Design
Transport - i-Transport
Arboriculture - SJA Trees

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Foreword

From the vibrant activity of the High Street to the sedate and sylvan residential areas, Epping has a deserved reputation for being one of the most attractive places to live in the country. Whether it's the proximity of Epping Forest afforded to the town centre and its neighbourhoods, or the direct links to the rolling pasture and woodland the around the town, Epping's residents enjoy the benefits of living in a historic market town and having woodland and the open countryside directly on their doorstep.

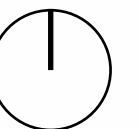
Epping is also well served by Transport for London rail services, and is the eastern terminus of the Central line of the London Underground. A journey from Epping to Oxford Circus takes 45 minutes and to Stratford takes 30 minutes.

Our site is within 5 minutes walk of both the High Street and the Railway Station.

- Primary vehicular access from Stonards Hill 01
- Country Park wraps around the new neighbourhood 02
- Winding rural style access road comes down the hill 03
- Balancing ponds positioned through the valley 04
- Woodland park at the heart of the new neighbourhood 05
- Allotments 06
- New woodland planting 07
- Community orchard 08
- Possible kickabout area 09
- Pedestrian and cycle access to Stonards Hill 10
- Existring tree groups retained within the layout 11
- Pedestrian link to Kendal Avenue 12
- Existing pond 13
- Mill Mound 14
- Mown paths 15
- Pedestrian and cycle access with limited vehicle access to flats 16
- Balancing pond as a key feature of the woodland park 17
- Country park car parking 18
- Residential street climbs up the hill 19
- Apartments 20
- Detached dwellings loosley arranged between tree groups 21



Proposed view looking north



A new neighbourhood at Epping

Wates Developments' aspiration is for a new neighbourhood at Epping which reflects a perfect blend of high quality urban living in harmony with its natural and historic surroundings. Using the existing natural features of the site and setting as the framework for the emerging masterplan, the new neighbourhood would feature the following placemaking elements:

- A strong sense of integration, where key routes could provide highly sustainable access to both Epping Town Centre and Epping railway station for pedestrians and cyclists
- A high quality development which aims to reflect traditional local building styles
- New homes laid out in coherent groupings which reflect local villages
- A new country park as a community asset surrounding the neighbourhood
- A masterplan design which features a network of linear green routes permeating the scheme on the alignment of the streams, hedgerows, tree belts and woodland groups
- Public access to over 6 ha of traditional species rich meadows within the country park
- The opportunity to provide a sustainable and productive place where orchards and allotments could be used to characterise the environment
- Distinctive street scenes running through the scheme characterised by a succession of evolving vistas

Existing trees and tree belts
would be retained within
the layout

Local materials would
be used on the proposed
buildings

Houses positioned side onto
the street would reflect the
traditional arrangement of
village streets



Sketch view showing proposed hillside housing in the south eastern part of the site

A network of linear routes
through the housing will be a
key resource for all

1. The Site

The site adjoins the settlement boundary of Epping and is within the administrative boundary of Epping Forest District Council (EFDC).

It consists of seven fields of rough grassland/pasture which immediately abuts the built up edge of Epping, as defined by the residential areas along Hartlands Road/Wedgewood Close/Theydon Grove to the north and Kendal Avenue to the west.

The rear elevations and garden fences of properties along Theydon Grove dominate the north western edge of the site. This is primarily because of the dramatic change in topography where the land falls away steeply into the central valley which runs through the site.

The north-east boundary of the site is formed by Stonards Hill and its associated tree belts, with the south-east boundary formed by the Epping Ongar Heritage Railway, which is in a deep cutting as it traverses the site.

The site is an enclosed and contained parcel of land as it is contained on most of its boundaries by woodlands, hedgerows and trees. It also contains some woodlands, substantial hedgerows and tree belts, which define the boundaries of the fields which make up the site. The landscape in the vicinity of the site is characterised by fairly large fields, mainly of arable land, with an undulating topography, within which woodlands, mature tree belts and substantial hedgerows are prevalent.

In terms of topography, the highest land is in the north-east corner of the site; from this high point the land falls towards the south-west corner of the site. There is a valley feature running through the centre of the site and this is occupied by a stream, which is fed by several field ditches. The land has an undulating topography and this is characteristic of the landscape to the east/south-east of Epping.

Location and access

The site is located on the eastern edge of the town and is connected via a number of residential roads and footpaths to the High Street, which is less than 5 minutes walk from the north western edge of the site.

Access to the site could be achieved at a number of locations including Hartland Road, Stonards Hill and the lane leading from Kendal Avenue

Rail and underground

Epping station is located less than 5 minutes walk from the Kendal Avenue access lane.

Epping is served by Transport for London rail services, and is the eastern terminus of the Central line of the London Underground. A journey from Epping to Oxford Circus takes 45 minutes and to Stratford takes 30 minutes.

Bus

The High Street has a number of bus stops with services into London and outward to places such as Harlow.



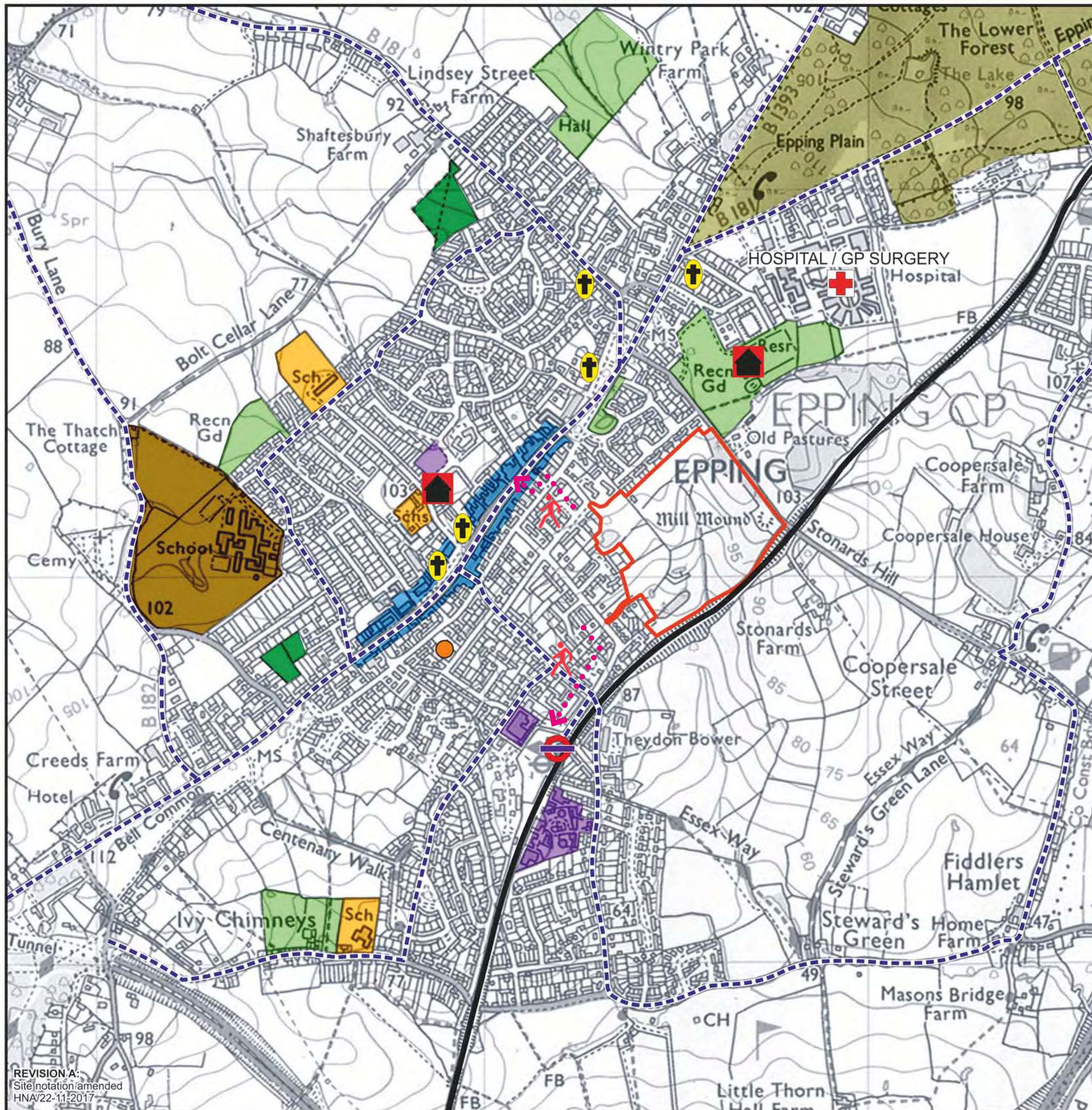
View looking north east in the eastern half of the site



Existing tree groups




View along Stonards Hill



-  THE SITE
-  PRIMARY SCHOOLS
-  SECONDARY SCHOOLS
-  RETAIL FACILITIES
-  EMPLOYMENT AREAS
-  OPEN SPACE
-  ALLOTMENTS
-  EPPING FOREST
-  COMMUNITY FACILITIES/HALLS
-  SPORTS HALL
-  HEALTH FACILITIES
-  PLACES OF WORSHIP
-  BUS ROUTES
-  EPPING TUBE STATION
-  UNDERGROUND LINE

PROJECT TITLE
Land at Stonards Hill
EPPING

DRAWING TITLE
Urban context plan

SCALE	DATE	CHECKED			
1:10000	JULY 2008				
	DRAWN	DATE			
	HP				
PROJECT No.					
4580			0	0	8 A

VINCENT AND GORBING
CHARTERED ARCHITECTS AND TOWN PLANNERS
STERLING COURT NORTON ROAD STEVENAGE HERTS
TELEPHONE: 01438 316331 FAX: 01438 722035

REVISION A:
Site notation amended
HNA/22-11-2017



View 1 - Lower part of Kendal Avenue



View 2 - View looking towards Hartland Road access



View 3 - Houses on Hartland Road next to the site



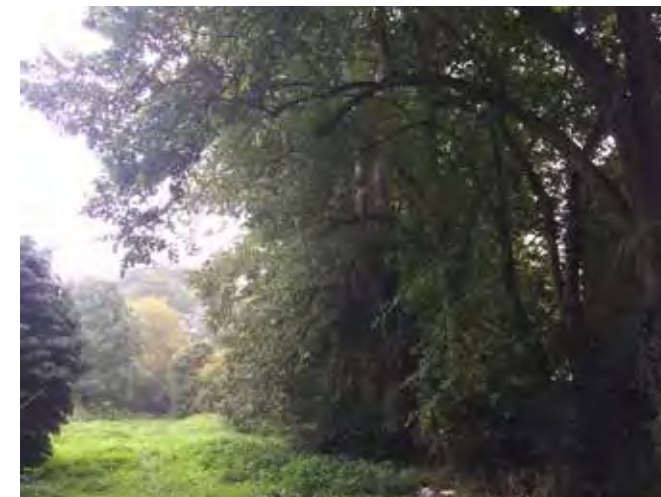
View 4 - View looking south along Stonards Hill



View 5 - View looking to the Kendal Avenue edge



View 6 - Steep slope in the centre of the site



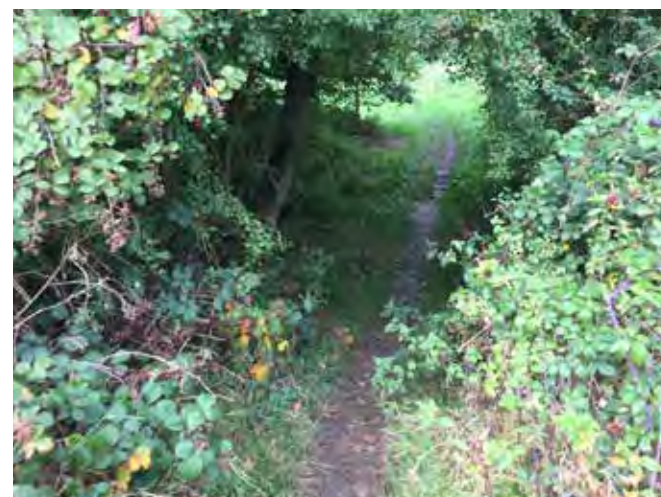
View 7 - Mature trees in the centre of the site



View 8 - Backs of houses at Theydon Grove



View 9 - Houses on Ravensmere



View 10 - Footpaths through the hedgerows



View 11 - Remnants of parkland fencing



View 12 - Kendal Avenue lane access

Aerial photograph and photograph viewpoints



F7 - Field number reference



Site boundary

2. Constraints and Opportunities

Landscape appraisal

Constraints - Topography

The topographical survey shows that the site lies at an elevation of between 110 and 75 metres AOD. The contours on the Topography Plan have been highlighted as ‘bands’ of colour with the darker colours indicating the higher land. The highest land is in the north-east corner of the site adjacent to the existing houses on Theydon Grove, with the land falling towards the south-west corner of the site. There is a valley feature running through the centre of the site and this is occupied by a stream, which is fed by several field ditches. The site has an undulating topography, which is characteristic of the landscape to the east/south-east of Epping.

The built up area of Epping occupies elevated land to the north-west of the site, and from here the land falls south-eastwards towards the M11 motorway, where it is at an elevation of about 50 metres AOD. To the east of the M11, the land rises onto a ridgeline up to 110 metres AOD. The landscape is undulating in character, with localised ridgelines divided by valley features.

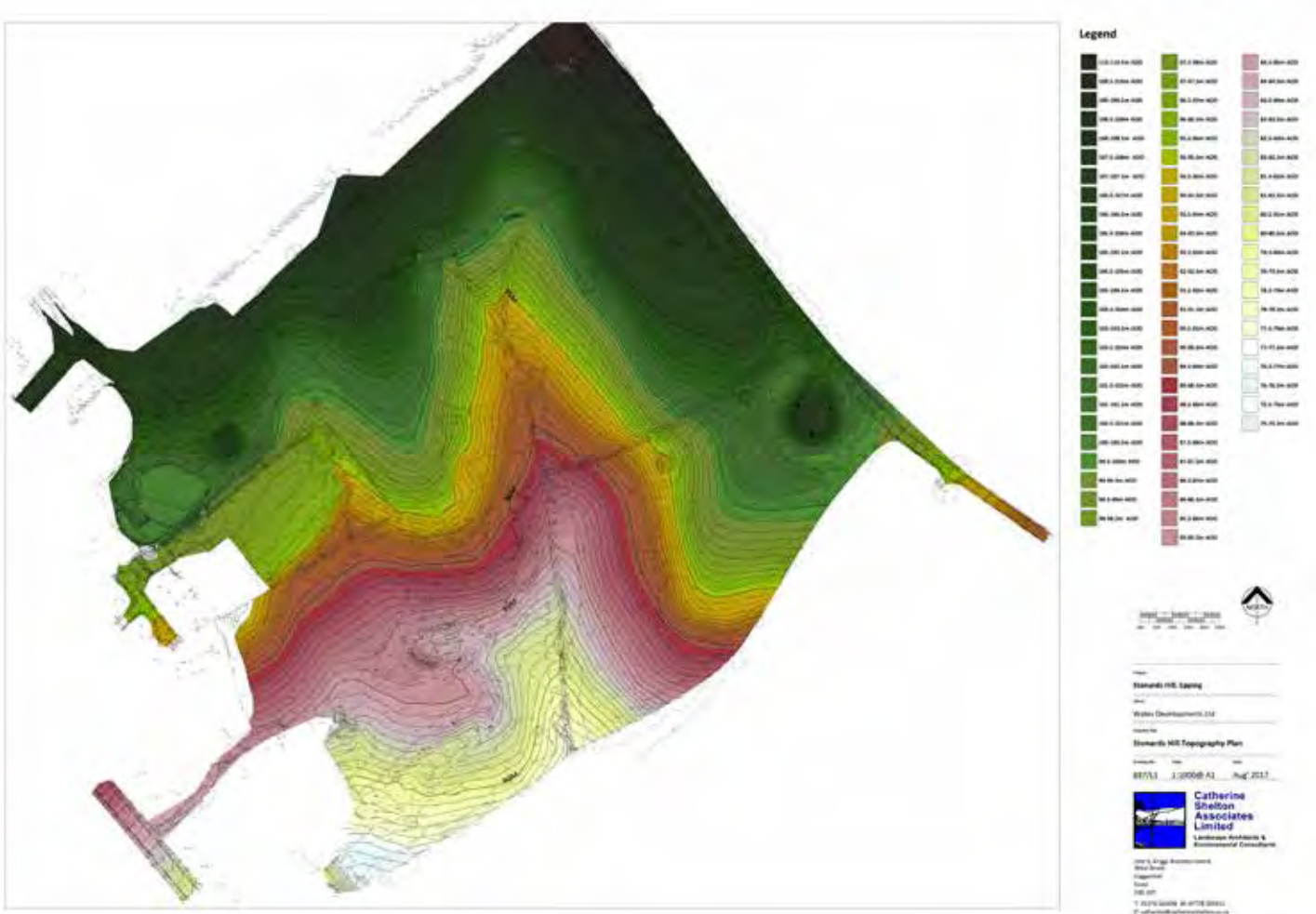
The natural topography of the landscape in the vicinity of the site is ‘interrupted’ by the route of the Epping Ongar Heritage Railway line, which is in a deep cutting as it traverses the site to pass under Stonards Hill. This railway line is set within areas of woodland and mature trees.

Constraints - Landscape Assessment

In summary the assessment has identified the following constraints and opportunities that should be carefully considered to ensure the protection/enhancement of the landscape character of the site and its surroundings and the amenity of visual receptors in the area.

Constraints - the preliminary landscape appraisal identified a number of landscape and visual constraints which need to be carefully considered as part of the preliminary design of the development framework for the site. These include:

- The mature woodland areas, tree belts and individual mature trees of value/quality on/adjacent to the site, some of which are the subject of Tree Preservation Orders.
- The framework of established (historic) hedgerows which subdivides the fields within the site, some of which may be classified as Important in the context of the Hedgerow Regulations.
- The undulating topography of the site which contributes to its enclosed/contained nature.
- Views into and across the site from neighbouring properties, including longer views from the houses on the elevated land abutting the northern boundary.
- Views towards the site (and the built up area of Epping) from the countryside to the east.






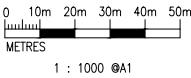
Topography plan


- The stream corridor through the site and its associated trees and habitats:
- The landscape character of the site, with the western fields exhibiting urban fringe characteristics, and the eastern fields having a ‘quasi-rural’ character:
- The landscape potential of some of the areas of immature woodland and trees:
- The level of tree cover on the site which contributes to its overall containment.

Opportunities - Landscape Assessment

- Retain and enhance good quality mature woodlands, tree belts and specimen trees to provide a framework for the built development on the site.
- Retain and enhance features of ecological interest, including native mixed hedgerows.
- The visually contained and lower lying fields in the western parts of the site have

UABc	Tree Categories
Trees are categorised in line with Table 1 of the British Standard 'Trees in relation to design, demolition and construction - Recommendations', BS 5837: 2012, according to their health, condition, quality and value.	
Category 'U':- Trees unsuitable for retention Category 'A':- Trees of high quality and value Category 'B':- Trees of moderate quality and value Category 'C':- Trees of low quality and value	
In most cases, Category 'A' trees should be retained, planned around, and be protected from damage.	
Category 'B' trees should also be retained if possible.	
Category 'C' trees will not usually be retained where they impose a significant constraint on development.	
	Root Protection Areas (RPAs)
To assist in the prediction of the likely impact of development on retained trees, a model is used. This model, based on the size of individual specimens, is the central feature of the British Standard 'Trees in relation to design, demolition and construction - Recommendations', BS 5837: 2012. This document provides a useful and consistent starting point for the assessment of likely impacts on trees.	
The Standard recommends that an area around each retained tree should be protected from disturbance in order to maintain the tree's viability; within which the protection of the roots and soil structure is treated as a priority.	
These root protection areas ('RPAs') have been calculated for all non-Category 'U' trees in accordance with Section 4.6 of the Standard; and are shown as areas bordered in green, blue or grey according to tree category. Normally portrayed as a circle of a fixed radius from the centre of the trunk; but where there appear to be barriers to root growth they have been reshaped to more accurately reflect the likely distribution of roots.	
	Arboricultural Constraints
The bold red line represents the closest to trees to be retained that proposed development can be located without encroaching into root protection areas ('RPAs').	
The bold blue line represents the closest to the canopies of trees to be retained that dwellings may be located without necessitating excessive or unacceptable pruning. Subject to tree species, habit, size and orientation, proposed dwellings can be located as close to 2m from existing canopy spreads (allowing for reasonable future pruning), as long as blind or partially blind flank walls face the trees. Non residential structures such as garages, sheds or bin stores may be located up to and even beneath tree canopies, but must not encroach into RPAs.	
Where proposed dwellings are located within an arc between the North West and East of retained trees (their shadow pattern through the main part of the day), elevations containing windows of living rooms or kitchens (habitable rooms, used for long periods during the day - BS 8206 Part 2), should not be sited so they directly face the trees within a distance equivalent to their present heights. These areas are indicated by the dashed pink segments on the plan.	
	Trees whose Removal could be Justified
Trees whose canopies are shown in light blue are those whose removal could be justified in arboricultural terms. These comprise Category 'C' specimens that are either surrounded by other, better quality trees, or those which are situated internally within the site and are not contributing significantly to the local landscape, boundary screening, or public views. Some Category 'A' or 'B' trees may also be included where it can be demonstrated that removal would neither impair the local landscape significantly, nor open up views into or out of the site.	
A tree shown as one whose removal could be justified does not mean that it has to be removed, nor that its removal is necessarily desirable in arboricultural or landscape terms; it means simply that in our judgement it should not be considered to be a material constraint on a proposed development layout.	
If specimens whose removal could be justified are to be retained, they must be protected from construction damage in the same way as those trees identified as being retained: i.e. there must be no development or disturbance of any kind within their root protection areas, the extents of which are depicted in green, blue or grey. In addition, proposed buildings should be sited no closer than 2m from the canopies of these trees.	



SJA ARBORICULTURAL PLANNING CONSULTANTS			
Project:	Stonards Hill, Epping		
Client:			
Drawing:	TREE CONSTRAINTS PLAN		
Drawing no:	SJA TCP 17154-01	Revision no:	
Based on:	Topographical survey		
Drawn by:	TCW/BMO	Date of issue:	Aug 2017
Checked by:	FPS/SRMJ	Tel: (01737) 813058	Scale: 1:1000 @ A1
Tree nos.:	284	Category 'U' trees:	281
Category 'A' RPA:		Category 'B' RPA:	
Dev't. area:		Shadow pattern:	290
For further information refer to the SJA Tree Survey Schedule			
Do not scale from this drawing: please check all dimensions on site, and notify us of any discrepancies. SJAtrees (the trading name of Simon Jones Associates Ltd.) cannot be held responsible for inaccuracies in the topographical plan on which this drawing is based.			
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- the highest capacity for development. The preliminary visual appraisal finds that fields F1, F3, F7, the western part of F6 (and the field in the north-west part of the site) are the most visually contained due to trees and topography.
- Enhance the existing tree cover and framework of hedgerows with new planting and positive management to improve connectivity, enhance biodiversity and to extend the age diversity of the tree population.
 - Enhance the landscape character and ecology of the site through the creation of linked informal open spaces/greenways/a country park.
 - Provide a network of informal recreation paths through the development and the open space areas to connect with public routes and the built up area.
 - Provide an attractive landscape setting to the new development through the retention and enhancement of existing landscape features;
 - Retain and enhance the existing watercourses to create a series of ponds and streams which form part of the SuDs system.
 - Create a wider range of habitat types within the site including woodland, hedgerows, scrub planting, species rich grasslands, wetlands and wildflower meadows.

Landscape and open space

The existing landscape features of the site provide a framework or setting for the development parcels, lending instant maturity and a ‘green’, attractive foil to the built forms which reinforces the landscape character and containment of the site. The high quality features such as woodlands, tree belts, mature specimen trees, hedgerows and the stream corridor are to be retained and enhanced, so that the landscape

and visual effects of the development scheme are minimised.

The principal landscape matters that have derived from the landscape and visual assessment and which should be used to inform the landscape strategy include the following objectives:

Objective 1 - To protect, positively manage and enhance the existing important mature and high quality landscape features and habitats of the site. This will be achieved by:

- Excluding built development, including dwellings, roads and drainage features, from any identified ‘protection zones’ around key landscape, arboricultural and ecological features.
- Allowing for the connectivity of landscape features and habitats within the development layout with new areas of planting and through the creation of new habitats such as scrub areas, wetlands and wildflower meadows.
- Providing a robust Green Infrastructure strategy as part of the development layout, which incorporates areas of open space, landscape features and ecological areas.
- Replacing the poor quality/immature woodlands/plantation areas with areas of mixed native tree/woodland planting to provide a diversity of trees within the site.

Adopting a landscape/ecological management programme to ensure the ongoing and positive management of both existing important features and new features/habitats.

Objective 2 - To provide a range of recreational opportunities for the proposed residents and

visitors.

This will be achieved by:

- Creating a substantial ‘Country Park’ in the eastern part of the site, which serves both new residents and visitors.
- Providing a range of open space and landscape experiences, including informal Country park, incidental informal open space, formal sports provision and play areas for all ages, allotments and a community orchard.
- Creating a system of well defined and accessible footpath and cycleway links between the various open spaces within the site, plus connections to off-site open space.

Objective 3 - To create a well landscape, contained and high quality ‘green’ setting for the development.

This will be achieved by:

- Protecting, managing for the long term and enhancing the landscape features which currently contribute to the character of the site including the mature woodlands, tree belts, specimen trees, framework of hedgerows and grassland areas, so that this character is retained and reinforced particularly within the ‘Country Park’ and informal open space areas.
- Protecting and enhancing (with new planting) the existing trees and landscape features along the boundaries of the site to maximise the screening provided and to retain the ‘rural’ character of the adjacent countryside.
- Minimising the removal of trees adjacent

to the new access to the development from Stonards Hill to retain the semi-rural character of this approach road into Epping.

- Protecting and enhancing (with new planting) the existing trees and landscape features along the eastern and southern boundaries of the site to provide sustainable, defensible and long term Green Belt boundaries.

Objective 4 - To provide a wide range of connected landscapes and habitats through the Green Infrastructure.

This will be achieved by:

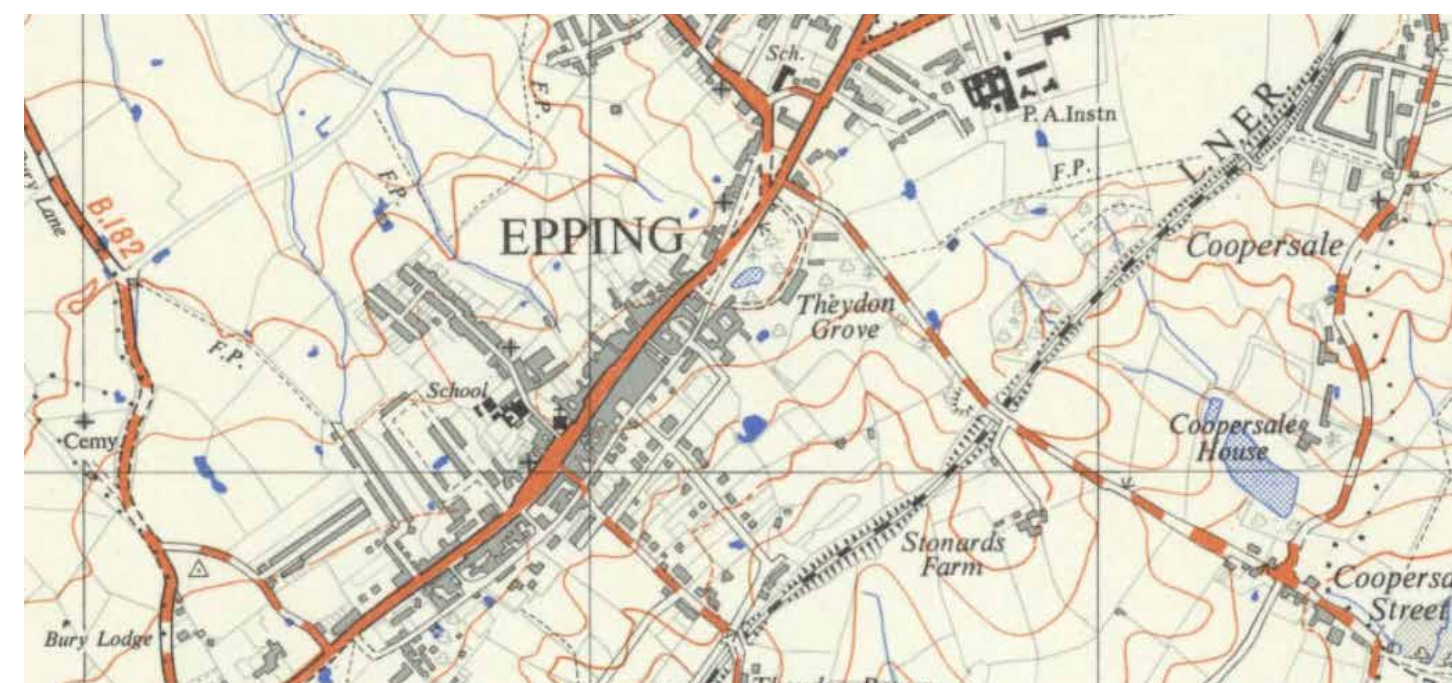
- Ongoing protection, enhancement and management of the existing and new woodland areas to provide a range of edge habitats and open glades or rides.
- Providing species rich grasslands and wildflower meadows especially within the ‘Country Park’ and the informal open spaces.
- Protecting, managing and enhancing the framework of hedgerows through the site to reinforce connectivity, increase species diversity and habitat types.
- As part of the management of the landscape and ecological habitats, instigating a programme of removal for non-native species such as Japanese Knotweed.
- Creating a system of SuDs ponds and ditches, managed to increase biodiversity, as part of the surface water drainage strategy for the development.
- Planting of a community orchard using traditional and local fruit trees.



1881



1896



1951

Heritage

The town of Epping has a rich heritage and its origins can be traced back to the Saxon period. The town has many attractive historic buildings, focussed on the Conservation Area around the High Street. Although this changed considerably in the 20th century, the character of an attractive market town is still evident. Whilst the Stonards Hill site lies outside of any heritage designations and is not within or adjacent to Epping Conservation Area, it is nevertheless important that any development respects the character and identity of the town.

The site once formed part of the land associated with Theydon Grove, a large 19th century country house just off Palmer's Hill at the north eastern end of the High Street. This was demolished in 1964 and replaced with a housing estate of the same name that lies to the north of the site. Of the original estate, only the gate lodge and a pond survive on the edge of Palmer's Hill. The fishing lake within the site also formed part of the estate.

There is one feature of archaeological interest within the site. This comprises the earthwork remains of a post-medieval mill mound which is located in the extreme eastern corner of the site in an area that would be public open space. As part of the development, heritage interpretation of the feature could be introduced to explain the function and historic appearance of the mill mound to users of the Country Park.

Previous studies have concluded that apart from that feature, the site is likely to have low archaeological potential. That said, the proposal to develop parts of the land will allow for a programme of archaeological evaluation in areas to be developed that could further the understanding of the history of settlement in the area.

Ecology

Detailed analysis of the site has been undertaken in order to assess the potential of the site to support biodiversity and to inform both measures to protect its existing value and opportunities to enhance that value in the future, alongside the development proposals in the masterplan.

None of the site is designated for its ecological value. The habitats on the site vary in ecological quality with the main fields being largely species poor grassland. The hedgerows and trees within the site have more ecological potential and there are various ponds and scrub vegetation. A full suite of surveys for notable species such as bats, dormice, reptiles, great crested newt, invertebrates and birds have been undertaken and remain on-going through the changing seasons to ensure a full understanding of the ecological value of the site. Importantly, none of the ponds on the site support great crested newt and detailed studies have confirmed that neither dormice or badgers are present.

This detailed ecological assessment of the site will be crucial in informing further design detail and ensuring that the management of the country park has, as a high priority, protection and enhancement of biodiversity.

3. Design Principles

Our proposals for a new neighbourhood at Epping will create the following:

- a distinct community which is directly linked to Epping whilst responding to the attractive landscape setting;
- a place which has good quality walking and cycling routes connecting the new neighbourhood to the existing facilities in the town and the railway station.

Nine key themes will underpin the development proposals and these are set out opposite.

1. QUALITY DESIGN

The emphasis will be on retention of as much as possible of the existing hedges, trees and woodlands. The design should focus on achieving spacious and efficient layouts and garden spaces where possible, whilst incorporating Building for Life principles as well.



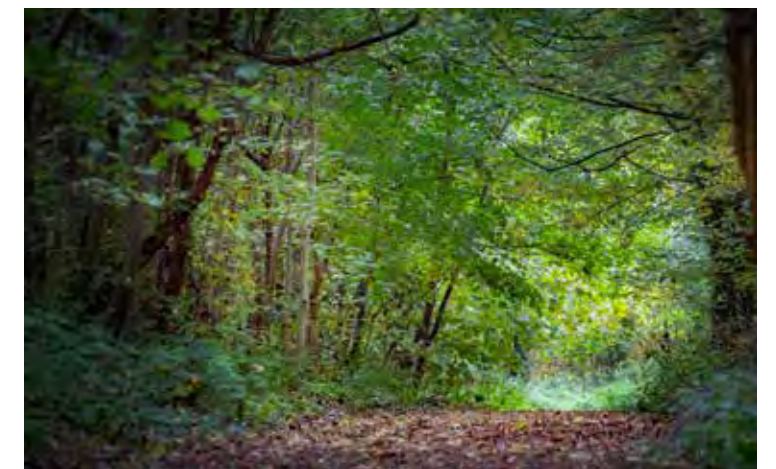
2. LOCALLY DISTINCTIVE

The new neighbourhood will have a strong coherent architectural theme which is derived from the local traditional building styles and estate character. Streets will be generous with attractively designed roads and high quality semi-mature trees planted from the outset.



3. WELL CONNECTED TO NATURE

The development will aim to feature a network of easily accessible green spaces linked by tree lined streets.



4. HISTORIC CONTEXT

The new neighbourhood would be designed in a manner which respects the historic setting of the town and key heritage features such as the adjacent Mill Mound.



7. CIVIC PRIDE

There is a strong commitment and leadership from Wates. The aim is to achieve support from partners and communities, with a commitment to continuous engagement with the community throughout the life of the project.



5. HEALTHY LIVING

A major new country park will provide new recreational space. In addition, allotments, community orchards and private gardens provide spaces and opportunities for residents to grow local produce. It is envisaged that the development will provide a comprehensive network of linked green spaces with cycleways, kickabouts and play spaces.



8. TECHNOLOGY

The use of technology for promoting awareness of community events and lifestyle choices will be at the heart of the information available to residents. This could be delivered through a residents' community website and/or social media.



6. TRAVEL CHOICES

There will be a well-connected network of footpaths and cycle routes linking with the surrounding area.



9. LONG TERM MANAGEMENT

Long term management of high quality green spaces and public realm would be secured along with play areas which benefit the community.



4. The Masterplan

The design strategy for a new garden neighbourhood at Epping is underpinned by a responsive masterplanning strategy, which seeks to directly engage with the existing site features, for example:

- ensuring that new high quality homes are arranged in a manner which respects existing features such as the tree belts, individual mature trees and adjacent historic features.
- by aligning streets to create vistas to the country park or other landscape and townscape elements.
- by placing parks and open spaces in locations next to existing mature trees or enclosing spaces next to woodland.

The masterplan places particular emphasis on creating a new place and an appropriate south eastern edge to Epping.

Our key objective is to combine the character of the mature woodland setting and domestic gardens, with the sense of community of a new neighbourhood. It will be a neighbourhood that is clearly reflective of its locality and the distinctive natural and built elements of this part of Epping will be woven into the fabric of the scheme. Major open spaces, front and rear gardens, green verges and parks will be brought together to create tranquillity and beauty. The design of houses, gardens, open space and community facilities will encourage social interaction, at the neighbourhood level.

We feel it would be important to reinforce the landscape setting of the south eastern edge of the settlement, by approaching the new neighbourhood through a substantial informal country park along the Stonards Hill flank.

The locally distinctive features of this part of Essex would be reflected and woven into the fabric of the new village, for example:

- Designing a locally distinctive street scene will depend on a thorough understanding of the local features such as the placement and grouping of buildings.
- Materials used for defining private and public boundaries, including Country park fencing and split chestnut post and rail.
- The public realm should reflect locally used soft and hard landscaping materials, as well as the species of trees and climbing plants.
- Building details such as common building styles, roof and chimney design, wall and coping details, and window details.
- Walling materials such as the coursed weatherboarding which is such a distinctive feature of Epping and the neighbouring villages.
- Suitable palette of street furniture and signage.
- Commonly used colour palette for painted timber elements, painted brickwork and render.

The Stonards Hill masterplan seeks to create a strong sense of place that directly responds to the features of the site and outward facing aspect across the country park to the east.

At the heart of the scheme will be a ‘woodland green’ which will accommodate a children’s play area and will be connected within the scheme and to the neighbouring street network. The mature linear routes, which in some cases follow the alignment of the linear drainage ditches and hedgerows.

Building heights and densities will respond to this structure and be greatest closest to the existing edge.

The new housing will be supported by an area of new allotments which could be situated in close proximity to the existing settlement.

Access Options

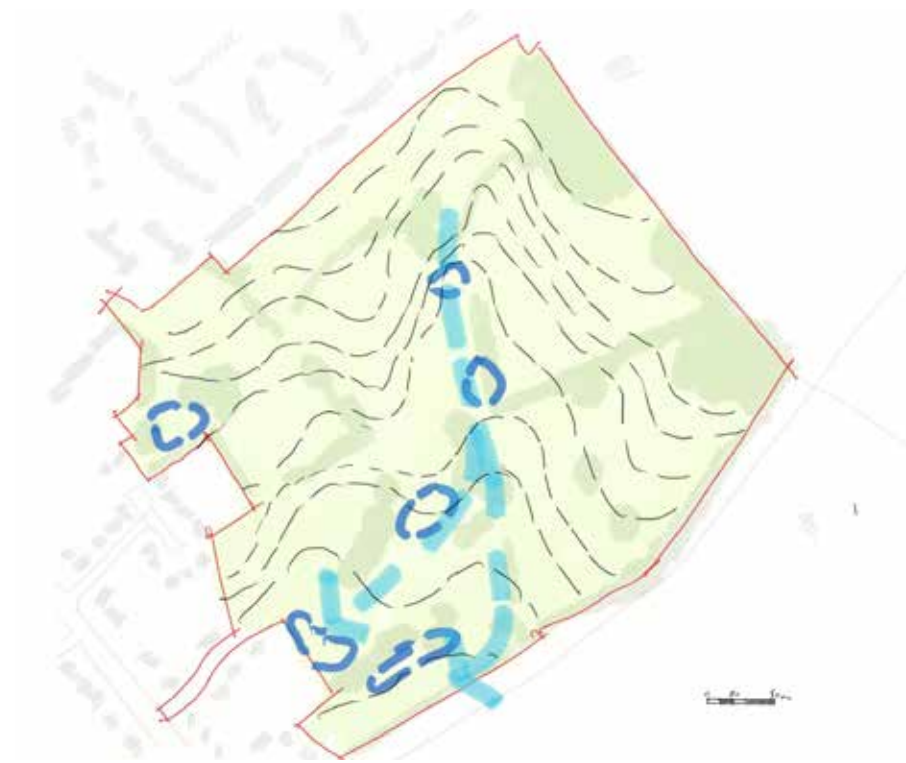
Further details of the access strategy are set out in section 6 of the vision document. The site benefits from a number of potential vehicle access options. These options include access from Hartland Road and a new access from Stonards Hill. In addition pedestrian and cycle access to Kendal Avenue will also be a key part of the sustainable access strategy.

Development details

At this stage of the assessments, the net residential area is 3.27ha, which at an average of 39 dwellings per hectare, would generate a housing yield of up to 130 units.



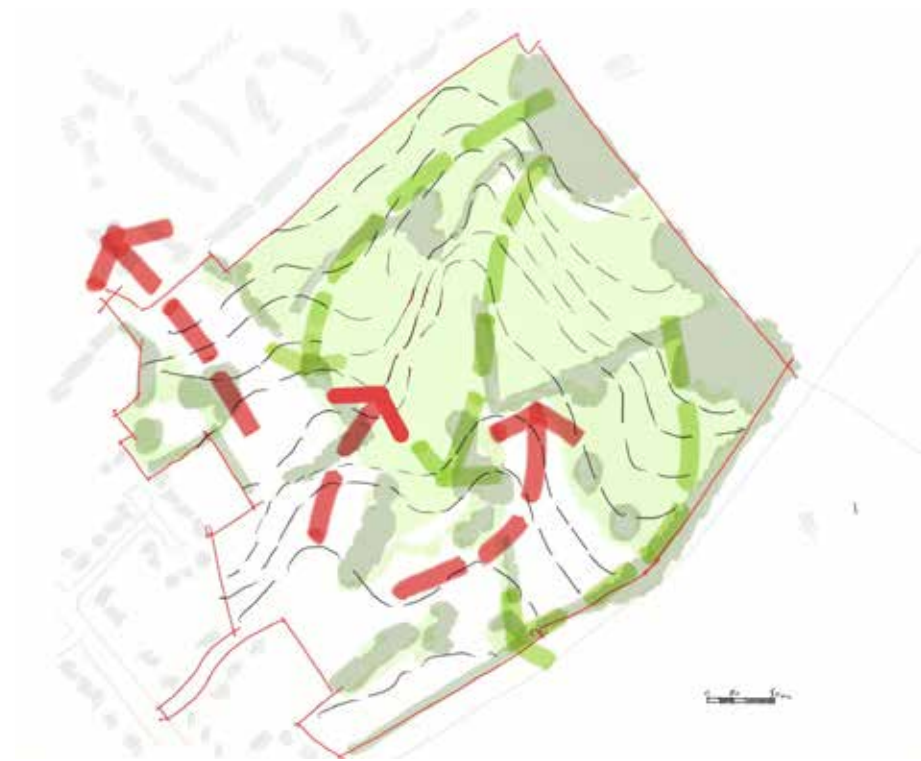
Respond to natural topography and vegetation pattern



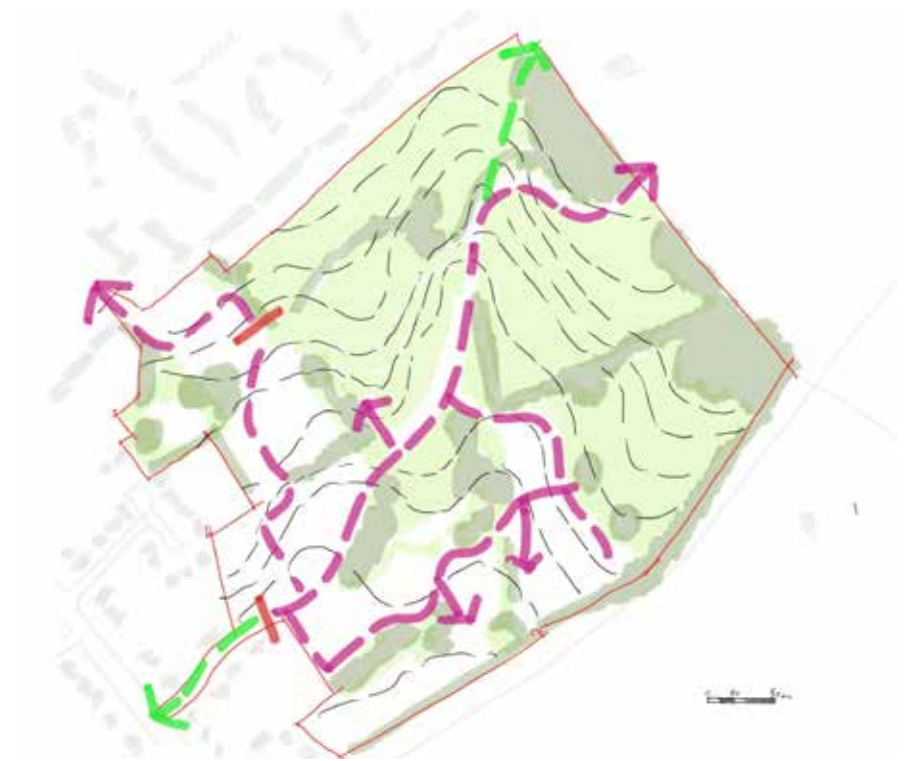
A central spine of sustainable drainage features



A green infrastructure framework linking the country park to a central park



Interplay between countryside & urban edge



Movement framework



Townscape strategy

Housing

The scheme will provide a wide range of housing types and tenures. This will range from 2 bedroom flats through to larger 5 bedroom family housing. In line with the requirements of the SHMA, the balance of house types will be weighted towards smaller 2 and 3 bed unit types. Bungalows could also be provided for older people.

Open Space Features

The Illustrative Masterplan has the potential to provide the following Open Space typologies and these shown on the plan opposite are in accordance with policy:

- 650m² LEAP with kickabout
- 0.4ha Allotments
- 8.9ha of new country park

Further design work on the green infrastructure will determine the position of these elements.

A new Country Park

The development will include a substantial Country Park in the eastern part of the site, coinciding with the higher areas of land on fields F4, F5 and F6. The proposals for this area, which will provide an amenity for the new development and the local community, are fairly low key and include:

- The retention, enhancement and positive management of the existing trees, hedgerows and woodland areas to enhance their landscape and ecological value.
- The over-seeding of the species poor improved grassland areas with species rich grasslands and wildflowers to create meadows with improved species diversity and amenity value.



Views of new housing are hidden
by the new native planting

Existing mature trees through the
centre of the site will be retained to
maintain the country park setting

Access road would be
designed in an informal
manner



Sketch view showing main access to the scheme from Stonards Hill

Bound gravel surfacing will
define an access road with no
markings or signage

Country park edge could
be defined by metal estate
boundary fencing with new
native species hedgerows

STONARDS HILL COUNTRY PARK - A NEW FACILITY FOR EPPING



- The provision of informal routes through to allow public access into the area (which is currently private land), including a route through to Stonards Hill.
- New planting (trees, hedgerows, woodland and scrub) to enhance the range of habitats in the area.
- The provision of wet loving species of grassland and marginal planting around the SuDS features along the valley.

The Country Park will incorporate a community orchard, which is one of the features that will provide community focus within the new development. Rows of fruit trees will be planted and the intention is to use locally sourced stock or old varieties from traditional growing areas elsewhere in the County. Areas of species rich grassland will be established under the trees, to improve species diversity.

This Country Park will be the subject of a management plan which would secure the future retention and management of this open space and its landscape and ecological features.



Country park approach road



Hoggin footpath to north east corner of site



Split chestnut fence



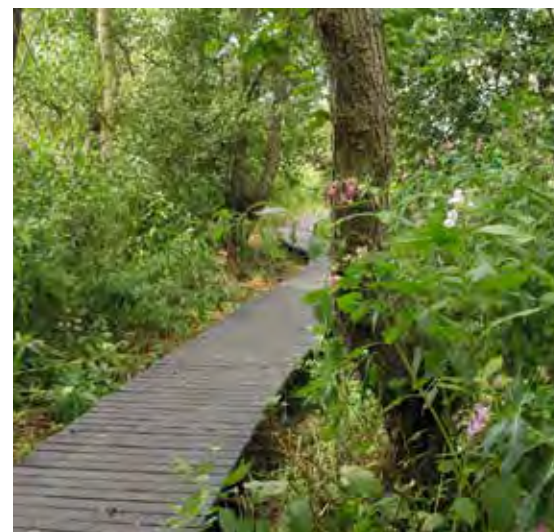
Tiered ponds linked by a stream



Mown footpath



Trim trails



Board walk through woodland



Balancing ponds as placemaking features



Wildflower meadow planting

Proposed Character

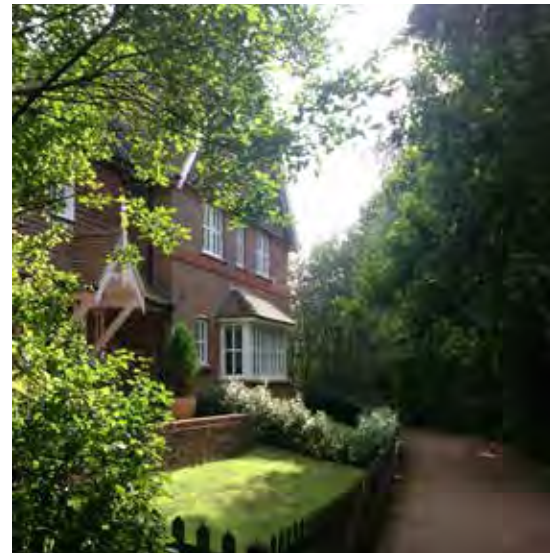
The over-riding design principle will be to work with the existing landscape setting to ensure that the new neighbourhood has a syvlan character. To acheive this, the development will primarily accommodate a lower density and semi-rural style of housing form. The layout will directly respond to the inherent features of the site such as the woodland groups, streams and ponds.

Buildings will need to be informally placed and generously spaced in order to ensure that the majority of streets have the feel of rural village lanes.

The interface with woodland edges and tree belts will be defined by an informal placement of detached and semi-detached dwellings which will respond to the sinuous alignment of these edges. To ensure natural surveillance is maintained throughout the adjacent green infrastructure, network buildings will be positioned to over look the edges of the site and maintain visual safety and security.

The buildings should be articulated with traditional architectural styles and materials which sit sympathetically within the sensitive parts of the site. Examples of the housing character include:

- Traditional building forms
- Attention to simple detailing
- Simple variations in building materials
- Variations in roofing material and roof orientation to give a varied street scene
- Set backs from the public realm to building frontages
- Corners articulated with a projecting building line.



Outward facing frontage against existing hedge



Outward facing frontage overlooking open countryside



Housing overlooking a SuDS street



Terraced housing in a woodland setting



Detached properties with gravel drive



New hillside housing



Shared drive leading to pedestrian link around the edge of development



Attractively designed rear parking courtyard

Larger family housing nestles within the backdrop of the wooded setting

Existing mature trees through the centre of the site will be retained to maintain the wooded setting



Sketch view showing housing set around informal spaces defined by existing tree groups

Internal road would be designed in an informal manner

5. Reflecting Locality

A key part of Wates' placemaking philosophy is a commitment to ensure that this scheme is sympathetically designed to be in harmony with the local landscape and building traditions.

The approach at Epping will be to work in harmony with the undulating landscape surrounded by Epping Forest. Although further masterplanning work needs to be done, early thoughts are that this new place would be laid out in a manner which respects the subtle topography and the views into and out of the site. At the same time we would want to celebrate the history of Epping by reflecting the many natural and man-made elements that define the character of the town. Design approaches to reinforce this harmony that could be effectively implemented at Epping could include:

- a careful analysis of the landscape and topography, not only to minimise the wider visual impact of the scheme, but to use the landscape in a positive manner which will allow the creation of a distinctive neighbourhood
- the neighbourhood will aim to reflect the changing nature of the landscape and be enclosed woodland character
- a robust landscape structure would allow a vibrant new community to flourish through its immediate access to a network of parks, open spaces, tree belts and woodland and onwards to the wider open countryside
- supporting the landscape setting of the scheme where possible by incorporating



elements of 'gently winding formal country estate' type drives, which serve to draw residents and visitors through a traditional country park setting

The locally distinctive features of the former estate and Epping and Essex should be reflected and woven into the fabric of the new village, as appropriate. For example:

- designing a locally distinctive street scene which will depend on a thorough understanding of the local features such as the placement and grouping of buildings
- materials used for defining private and public boundaries, including Country park fencing and split chestnut post and rail as appropriate
- the public realm should reflect locally used soft and hard landscaping materials, as well as tree species and climbing plants
- building details such as common building styles, roof and chimney design, window, wall and coping details could be incorporated
- walling materials such as red brick, some yellow London brick, painted brick and painted render to be included in design assessment
- feature dressing materials such as weatherboarding, render with pargetting where appropriate
- roofing materials such as natural slate and clay tiles could be used to enhance the scheme

Mature trees bound the edges of the Green at Epping



Wide fronted Georgian and Victorian properties front the green

There are many examples of traditional Essex weatherboarded houses near to the site



Private lawns and public greens are key features in the setting of these traditional buildings

Double height bay windows, gables and dormer windows define the local character

Large family houses set within generous plots



Villas set within larger plots are defined by hedgerows and mature landscape features

Decorative tile hanging on prominent gables is a key feature of many of the local buildings



- reflecting distinctive 'feature' buildings on the estate which employ half timbering and mock tudor styles where they achieve good design
- suitable palette of street furniture and signage
- commonly used colour palette for painted timber elements, painted brickwork and render
- Responsive masterplanning which would directly engage with the existing features, for example:
 - ensuring that high quality homes are arranged in a manner which respects existing features such as tree belts and individual mature trees
 - by aligning streets to create vistas to existing mature trees or views to distant hills or other landscape elements
 - by placing parks and open spaces in locations next to existing mature trees or enclosing spaces next to woodland
- Our design work would place particular emphasis on creating new places such as pedestrian only 'walks' and high quality shared streets which would nestle next to mature woodland or hedgerows.

In summary, our key objective would be to combine the character of the mature country park and domestic gardens with the sense of community of a village. It will be a village that is clearly reflective of its locality and the distinctive natural and built elements of Epping will be woven into the fabric of the scheme. The site is within a short walk of everyday facilities including local shops, schools and for



Weatherboarded one and half storey cottage



Pargetting feature



Semi-detached workers cottage



Semi-detached Edwardian villas with distinctive mansard roof



Traditional east of England village house with asymmetric gables and classical portico

6. Access Strategy

leisure (for example, eating, socialising and sport) – providing an opportunity to extend Epping’s ‘walkable neighbourhood’.

It has excellent connection to the public transport network – it is approximately a 400m (5 minute) walk to Epping Underground station, trains run every 4-5 minutes at peak times and every 6-8 minutes off peak providing a fast service into central London (approx. 40 minute journey time).

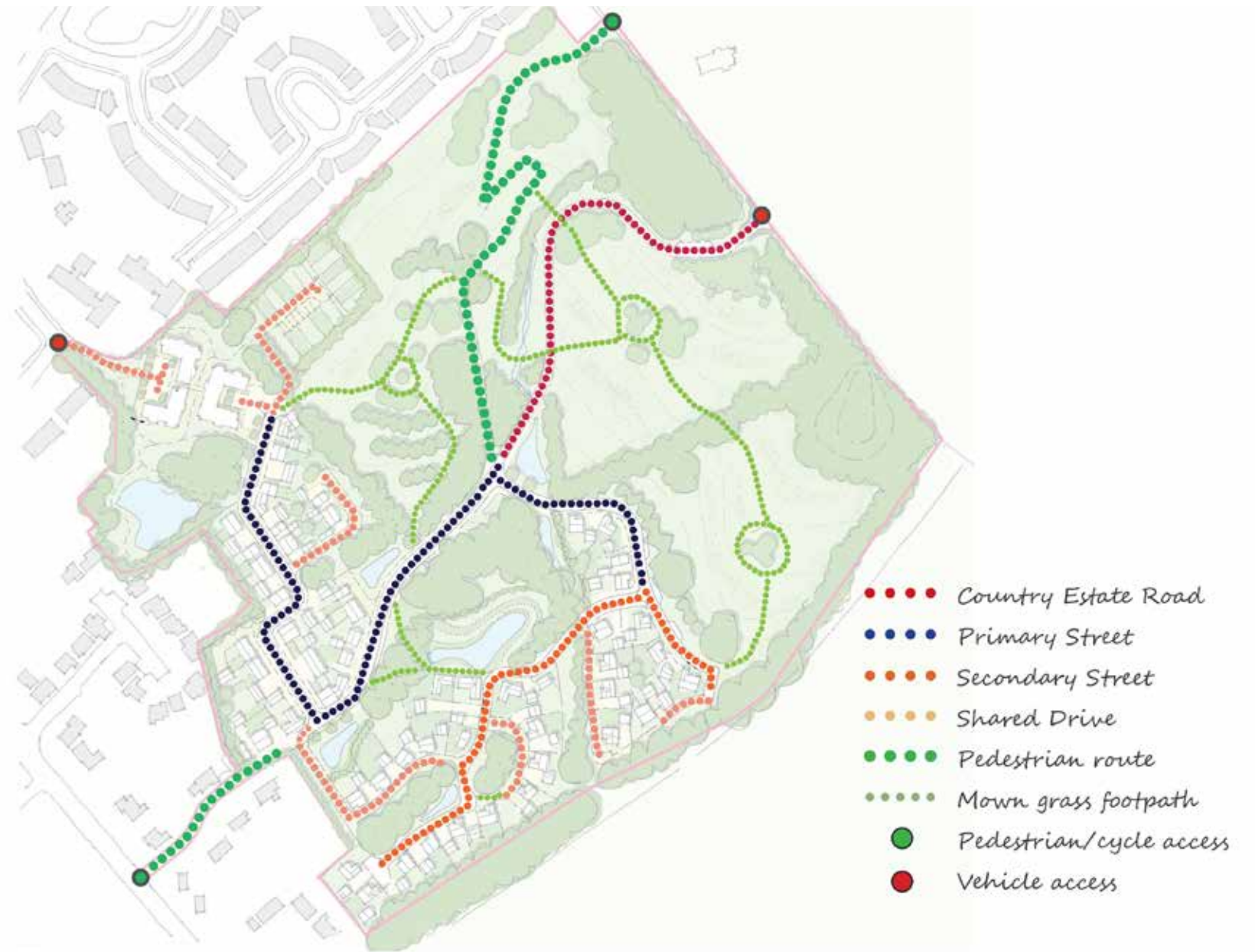
The site is approximately a 600m (8 minute) walk to the nearest bus stops providing services to Harlow, Waltham Cross, Ongar and other destinations seven days a week – meaning that residents will not need to rely on private car use.

The primary vehicular access to the site via Stonards Hill will reduce the potential impact of the development on Epping Town Centre as residents are able to access strategic routes by avoiding this area and traveling northeast on the B1393 to the M11, or by travelling south on Stonards Hill around the south side of Epping and east to the M25.

The primary vehicle access from Stonards Hill will be designed in a form that is sensitive to the local area and would be designed in an informal manner with an alignment that encourages slow traffic speeds and safe use by cyclists.

A minor access to Hartlands Road will serve a limited number of dwellings and would provide a direct and convenient pedestrian and cycle connection to Epping Town Centre;

An attractive pedestrian and cycle connection

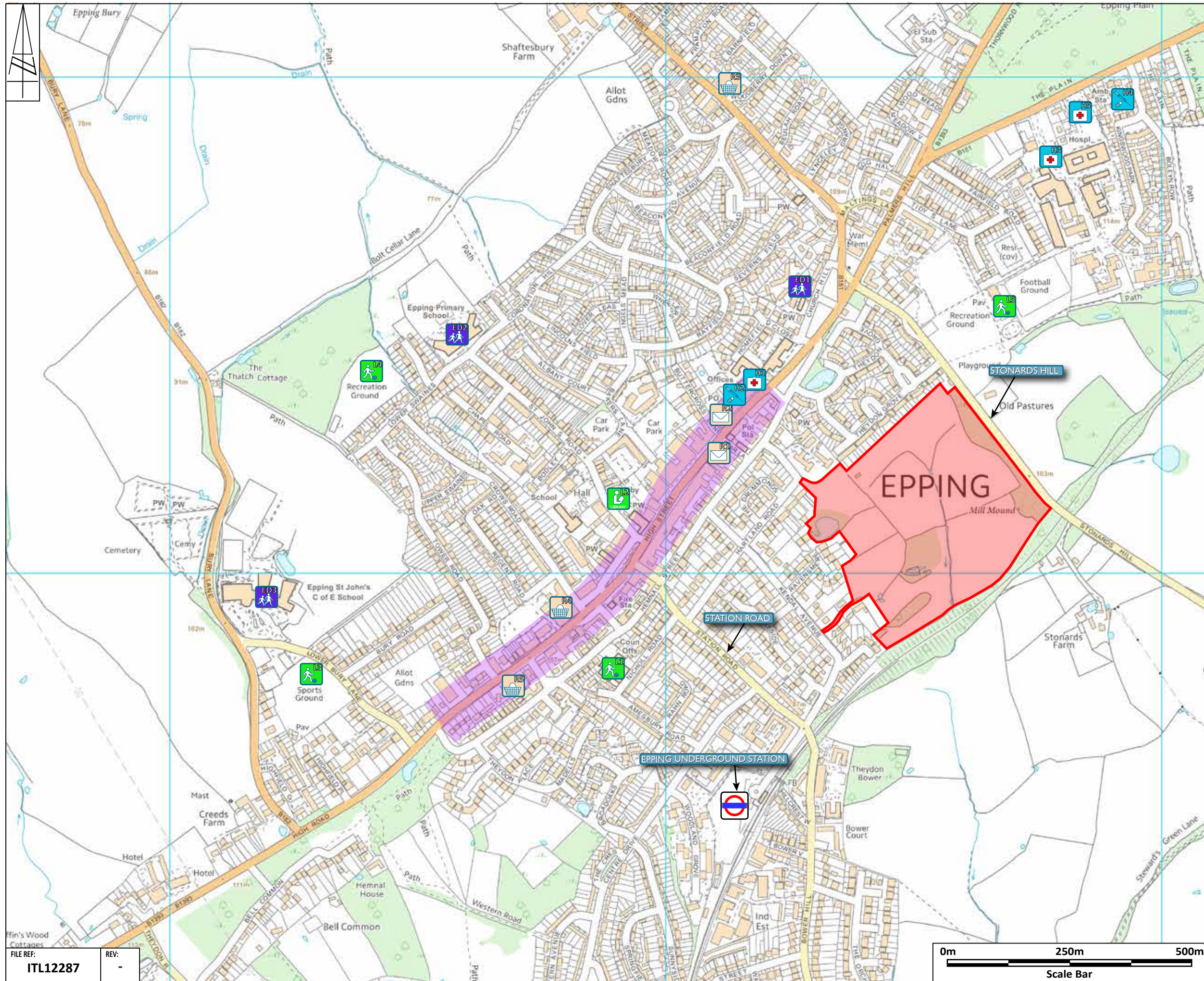


Access strategy

to Kendal Avenue will provide a direct walking and cycling route from the site to Epping Underground Station (5 minute walk), this forms an important part of the sustainable transport strategy and makes the site highly accessible.

Development of the site will include footpaths for recreational use by the public. These will

link to a off-site destinations and provide a connection to the Stonards Hill Recreation Ground and improve wider pedestrian permeability in the area.



KEY



SITE LOCATION



EPPING UNDERGROUND STATION

RETAIL

HIGH STREET



ROYAL MAIL DELIVERY OFFICE



ALLNATTS POST OFFICE



LONDIS



TESCO SUPER STORE



SHELL PETROL STATION

EDUCATION



EPPING MONTESSORI NURSERY



EPPING PRIMARY SCHOOL



EPPING ST JOHN'S SCHOOL

LEISURE



EPPING SPORTS CENTRE



EPPING LIBRARY



EPPING CRICKET GROUND AND TENNIS CLUB



LOWER SWAINES RECREATION GROUNDS



RECREATION AND FOOTBALL GROUNDS

HEALTH



THE HIGH STREET SURGERY



LLOYDS PHARMACY



ST MARGARET'S HOSPITAL



WELLS PHARMACY



THE LIMES MEDICAL CENTRE



4 Lombard Street, London,
EC3V 9HD

Tel: 020 7190 2820

www.i-transport.co.uk

TITLE:

STONARDS HILL, EPPING
LOCAL FACILITIES

FIGURE No:

FIGURE 1

FILE REF:
ITL12287

REV:
-

0m 250m 500m
Scale Bar

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7. Planning Context

Epping Forest District Council are producing a new Local Plan that will help shape the District for the coming years until 2033. A Draft Local Plan was published in November 2016 which set out the proposed strategy to meet the economic and housing growth in the District, identifying potential sites for development and regeneration and the community infrastructure to support growth. The land at Stonards Hill was one of those sites identified for development. .

The Council is now preparing a further version of the Local Plan that will be submitted to the Secretary of State in early 2018. The Secretary of State, through an appointed independent ‘Inspector,’ will consider if the Council has allocated sufficient land in the right places to meet the needs of housing, employment and other uses within the District whilst preserving as much of the Green Belt and countryside as possible and ensuring that the attractive places and environment of the district are protected and enhanced.

Whilst it will always be preferable to focus development on ‘brownfield’ land within the built up area, some Green Belt land will be needed if housing needs are to be met given that the District has to accommodate at least 11,400 new homes over the Local Plan period (2011-2033). Failure to meet housing needs exacerbates unaffordability of housing in an area with very high house prices and reduces the extent to which people can choose to

live and work in the local area. This is the challenge that the Council faces.

The Council has undertaken a detailed site selection process in order to ensure that the loss of Green Belt is minimised and those sites that are allocated for development result in the least possible overall intrusion into the Green Belt. Moreover, development must be in locations that are close to day-to-day services and public transport. The Council, in their Draft Plan, has concluded that this site meets those strict criteria.

At the same time, the Town Council is preparing their own Neighbourhood Plan to guide the future of the town. Wates Developments are committed to engaging fully with this neighbourhood planning process and have already sought the views of the Town Council on the proposed neighbourhood illustrated here. Whilst national planning policy stipulates that Neighbourhood Plans cannot release land from the Green Belt (this being a strategic function of the Local Plan), Wates Developments intend to work closely with the Town Council to ensure that this new neighbourhood is brought forward in a way which meets local aspirations for preserving and enhancing the character and amenity of the town.

The Local Plan makes clear that development should include a range of house type and size to address local requirements, including

for ‘down-sizing’; it further requires that the type of housing is carefully considered and is appropriate to the size, location and characteristics of the site and the established character and density of the neighbourhood. The new neighbourhood proposed here will meet that guidance.

The proposals will also meet the requirements of the emerging Local Plan to provide affordable housing. In total, 40% of the new homes provided will be affordable housing including affordable rent and intermediate tenure (eg. shared ownership) housing, the mix of which will accord with the latest available evidence set out by the Council on the sizes of affordable homes required.

It is vital that new homes are served by adequate community infrastructure such as schools and health facilities. The new neighbourhood will provide a package of measures including financial contributions to enhance these facilities for the benefit of the whole community.



View of tree groups in the centre of the site



Epping High Street



Epping underground station

Wates Developments is committed to working with the local community to achieve locally distinctive 'place making'. We recognise the long term value which can be generated in committing to high quality public realm and initiatives which create strong and lasting communities. Most importantly we believe in building much needed new homes that will respect and enhance their natural setting and this will be at the forefront of our design strategy at Stonards Hill.



