

29<sup>th</sup> January 2018

***Sent by Email to: [ldfconsult@eppingforestdc.gov.uk](mailto:ldfconsult@eppingforestdc.gov.uk)***

Local Plan Regulation 19 Representation  
Planning Policy Team  
Epping Forest District Council  
Civic Offices  
323 High Street  
Epping  
Essex  
CM16 4BZ

Dear Sirs

**Epping Forest District Local Plan: Submission Version 2017  
Representations on behalf of Manor Oak Homes**

We refer to your current consultation on the Epping Forest District Local Plan: Submission Version 2017 and are pleased now to provide representations prepared on behalf of our client, Manor Oak Homes. Manor Oak Homes have an interest in land forming part of the proposed Garden Town Community at Water Lane, Harlow (known as Land at West Sumners) and are extremely grateful for the opportunity to comment on the emerging Plan.

While we have completed your standard response form, Manor Oak Homes have some detailed points to make, which are more easily dealt with in this letter. It is important to point out from the outset that our client welcomes the continued allocation of their land and are extremely supportive of the draft Local Plan believing it to be both legally compliant and sound. The comments they make are therefore ones that relate to the detailed expectations of the policies relating to their site and seek clarification to ensure its effective delivery.

We are aware that it is sometimes the case that only those raising objection to a plan are permitted to attend and take part in a local plan examination. Although Manor Oak Homes do not object to the draft Local Plan, as a promoter of one of the Garden Town Communities upon which the delivery of the local plan strategy is dependent, they do consider it would be beneficial for them to attend and take part in the examination so that they may be on hand to offer assistance to the Council and Inspector. They therefore respectfully request that they be permitted to attend and take part in the sessions relevant to their representations.

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**Policy SP2 Spatial Development Strategy 2016-2033**

Manor Oak Homes welcome the decision to deliver approximately 51,100 new homes across the Housing Market Area over the plan period, of which 11,400 new homes will be delivered in Epping Forest via Policy SP2. The level of housing the Council is planning to deliver through the plan represents a step change from that delivered through previous plans and this is welcomed. They further support the recognition of Harlow as representing one of the most sustainable locations within the HMA to accommodate new growth and the decision for this reason to release a number of strategic sites to create Garden Town Communities around its boundaries. The decision to release those sites has been influenced by a robust Green Belt Review and thorough assessment of urban capacity and site suitability, which demonstrates the lack of alternative available and sustainable sites and that the proposals would secure the achievement of sustainable patterns of development, key considerations when determining whether the 'exceptional circumstances' test for green belt release has been met.

Paragraph 2.81 of the explanatory text refers to the housing trajectory. We note that the Water Lane Garden Community is expected to commence delivery in 2021/22 with a combined yield across all land parcels of 100 dwellings in that year increasing to 200 per annum thereafter until 2031/32. We can confirm that based upon the timetable set out at Figure 2.1 and our clients experience of site delivery, that the trajectory is based upon realistic and achievable assumptions.

**Policy SP3 Place Making**

Manor Oak Homes support the place shaping principles set out under Policy SP3.

**Policy SP4 Development & Delivery of Garden Communities**

Manor Oak Homes welcome and support the allocation of their land as part of the Water Lane Garden Town Community and are comfortable with the overarching requirements set out as part of Policy SP4.

The preparation of a single Strategic Masterplan for the Water Lane Area is expected by Policies SP4 and SP5. Manor Oak Homes has no objection to the production of a single Strategic Masterplan, appreciating that a co-ordinated and joined up approach to the planning and delivery of the Garden Community will be required, and very much welcome the opportunity to progress this work at the earliest opportunity in line with the programme identified at Figure 2.1 of the draft Local Plan.

We note the expectation in paragraph 2.92 of the supporting text that the precise nature and detail of each strategic masterplan will vary depending upon the context and complexity of the site in question and that those involving multiple ownerships are likely to comprise a high-level overarching framework. Land within the Water Lane Area is in a number of ownerships and does not comprise one single land parcel. Instead, it comprises two parcels – West Katherines to the north and immediately south of Water Lane and West Sumners further south of Water Lane between Epping Road and Parsloe Road – which are divided by land owned by the Redwings Horse and Donkey Sanctuary and is unavailable for development. As a reflection of this, this land does not form part of the residential allocation at Water Lane although it falls within the overall masterplan area. While the parcels are located in the same general area there are differences in their site-specific constraints and context and the existence of intervening land means that there is no direct interface between them. We consider therefore that an approach based on a high-level overarching framework is entirely

appropriate to deal with key principles, land uses and structure, supported by more detailed site-specific masterplans, which themselves will form the basis of future outline planning applications.

We can confirm that dialogue and a process of joint working has already begun between Manor Oak Homes and the owners and promoters of land at West Katherine's. In this context, we believe that there is no reason why the expectations of Policies SP4 and the objectives for a co-ordinated approach to the planning and delivery of the Water Lane Garden Community cannot be realised.

The expectation that planning applications be submitted in the period between the Local Plan Examination and the receipt of the Inspector's Report so that they can be approved as soon as the local plan is adopted and that the delivery of sites can commence at the earliest opportunity, is welcomed. We would however be grateful for clarification as to the expectation relating to the scope of planning applications for the Water Lane Area. As there is no express reference to the need for a joint planning application, we assume there is no objection to the submission of planning applications based upon land ownership subject to compliance with the overarching masterplan and their delivery independently from one another thereafter. We understand that the owners and promoters of other land parcels within the Water Lane Area are just as keen as Manor Oak Homes to realise the delivery of their land at the earliest opportunity. To achieve this, it is vital that each is able to submit planning applications for their respective sites according to their own timescales and that one is not beholden to the other.

#### **Policy SP5 Garden Town Communities**

Policy SP5 sets out the more detailed site-specific requirements for each of the three Garden Town Communities. SP5C expects infrastructure requirements for each community to be delivered at a rate and scale to meet the needs that arise for the proposed development in accord with the Infrastructure Delivery Plan. There is no objection in principle to this, however the infrastructure improvements needed to support each of the communities has yet to be clarified and the extent to which this could affect their viability is therefore unclear. The delivery of the local plan strategy depends on the viability of the final schemes and therefore Manor Oak Homes suggest that recognition of this be incorporated into the policy as follows:

- C. Infrastructure requirements must be delivered subject to viability at a rate and scale to meet the needs that arise from the proposed development, in accordance with the Infrastructure Delivery Plan. Development identified in this policy will be expected to make a contribution proportionate to its scale and impact for the delivery of improvements to Junction 7 and other strategic infrastructure requirements.

In relation to the Water Lane Area Manor Oak Homes have no objection to the site-specific requirements set out at SP5.2. They do however, consider that clarification is required to explain whether and how each one relates to each of the residential allocation sites within the masterplan area. It is our understanding that many of the items for on-site delivery within section G of the policy will be "one off" items rather than being split between the sites. For example, the traveller pitches, the local centre and the school. Other facilities could potentially be shared, such as early years and "appropriate community and health facilities". It is appreciated that the distribution of land uses is a matter that will be clarified through the preparation of the Strategic Masterplan but for the sake of transparency and to enable those promoting land to understand exactly what they will be expected to make provision for, we consider that further clarification on this either in the policy or supporting text would be beneficial.

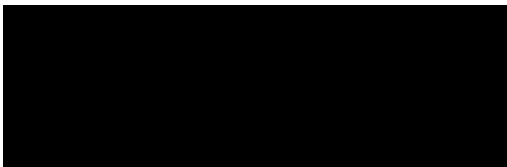
These representations are accompanied by a Design Vision Document that identifies the constraints and opportunities of our client's land at West Sumners and includes at page 17 a concept masterplan that shows how it could accommodate up to 1,000 dwellings as part of a scheme that would follow the TCPA's Garden City Principles, comply with the place making principles set out under Policies SP3 and 4, as well as each of the individual requirements of Policy SP5. The only exception to this is in relation to education where as a reflection of the location of Water Lane Primary School immediately adjacent to the north-eastern boundary of the site, the masterplan identifies expansion land for the existing school rather than land for the provision of a new primary school.

### **Policy SP6 Green Belt and District Open Land**

Policy SP6 with reference to Map 2.5 identifies the general extent of the Green Belt and the alterations proposed to its boundaries by the draft Plan. The proposed alteration to the west of Harlow to remove the Water Lane Area from the Green Belt so that it may be developed as a Garden Town Community is supported by Manor Oak Homes.

We hope these comments are helpful and that due regard will be had to them. As always, if you have any queries or would like to discuss further, then please do not hesitate to contact myself or my colleague, Geoff Armstrong.

Yours faithfully



Lynsey Rigg ([lynsey.rigg@arplanning.co.uk](mailto:lynsey.rigg@arplanning.co.uk))

**Director**

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