

CDS PLANNING

PLANNING & DEVELOPMENT CONSULTANTS

Representations on Main Modifications to
emerging Epping Forest District Local Plan

**(Allocation THOR.R2) - Rosario,
Thornwood**

New residential development

For and on Behalf of Haynes New Homes

1. Introduction

- 1.1. This statement has been prepared to provide representations in relation to the draft policy within the emerging Epping Forest Local Plan.
- 1.2. The comments are made on behalf of the land owner and future applicant for planning permission, Haynes New Homes, at the allocated site, known as THOR R2, Rosario in Thornwood.
- 1.3. Attached to these representations include –
 - Vision Document prepared for by Blue Pencil Designs;
 - Proposed amended policy map;
 - Required MM forms.
- 1.4. The applicants have entered into a planning performance agreement to deliver the site in collaboration with the Council.
- 1.5. A wide variety of professional consultants have been appointed and a pre-application process is underway discussing emerging proposals for a new residential development at the site.
- 1.6. The attached Vision Document is submitted to the Councils Development Management team as part of pre-application discussion.

2. Site Description

- 2.1. The site is located on the west side of High Road, Thornwood. The site is excellently located in Thornwood, which is close to Epping to the South, and Harlow beyond to the north. The total area of the site is approximately 3.7 ha.

- 2.2. The location benefits from being within walking distance of several local amenities, as well as bus stops. Thornwood Common (discussed below) is a short walk south/east of the site and further amenities, including Epping underground station, can be accessed easily by public transport in Epping town centre.

3. Site Location

- 3.1. The site has a draft allocation (**P11**) in the emerging Local Plan which is at an advanced stage. There are no flood risk issues associated with the site.
- 3.2. The site does not lie in a conservation area or in close proximity to any listed buildings.
- 3.3. The site is available, deliverable and has a willing landowner keen to develop the site for both market and affordable housing at policy levels.
- 3.4. Draft policy **P11** identifies the site suitable for residential development (circa 48 homes). The development at P11 is one of several in Thornwood included for draft allocation within the Epping Submission Version Local Plan.

4. Main Modification Consultation

- 4.1. The current adopted planning policy framework is the Epping Forest Development Plan (1998), and Alterations (2006), and the National Planning Policy Framework (2021).
- 4.2. Paragraph 16 of the NPPF provides that plans should be :
- a) be prepared with the objective of contributing to the achievement of sustainable development;
 - b) be prepared positively, in a way that is aspirational but deliverable;

- c) be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

4.3. Paragraph 35 of the NPPF confirms plans can be found sound if –

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

- 4.4. The Council are proposing modifications to the site draft policy (P 11) which we duly consider should be amended further.
- 4.5. We are concerned that the current policy map restricts the capacity of the site which will make 48 new homes very difficult to achieve. Since the policy maps were prepared new design constraints have been introduced including, additional land take for Essex Suds requirements, car parking spaces and sizes, and national design space standards which will reduce the number of new homes within the development site area.
- 4.6. We strongly suggest that the policy maps are revised to provide a more cohesive and comprehensive development.
- 4.7. The submitted pre-application proposals show that additional housing could come forward in an acceptable form by revising the residential site allocation boundaries. This is shown on the attached drawing (Alternative Proposals Map), which would bring the development allocation inline with neighbouring site THOR.E1.
- 4.8. The subject site is very well contained and if the proposals map is amended could provide circa 70 new homes inclusive of policy levels of affordable housing.
- 4.9. Within the pre-application vision document, the scheme makes allowances for car parking, open spaces and sustainable urban drainage and is technically considered deliverable.

- 4.10. There will be the additional benefit of being able to support future improvements to the existing local green space at 'Thornwood Common' (image below on page 6).
- 4.11. The site at THOR.R2 is on the outer extremities of Thornwood which makes any large open space and play areas highly likely to be under used by the existing community.
- 4.12. We strongly suggest that it would be more appropriate and better planning to upgrade the existing Thornwood Common and play area (which is in need of restoration) for community benefit, allowing for more to use this important space. This would then support a more comprehensive residential scheme at THOR.R2 and boost housing on allocated sites.



(image above showing existing open space suggesting to me upgraded)

- 4.13. The site at THOR.R2 is very well contained and has very limited views due to the boundary planting that is being retained as part of proposals. On this basis there is no impact to the wider purposes or functions of the Green Belt by amending the boundaries to the residential allocation. This site is wholly within the same ownership.

- 4.14. We strongly suggest that (MM96) should be amended further by stating 'THOR.R2 Land East West of High Road – Approximately **70** homes"
- 4.15. We agree with the Council's typo, the site is west of High Road.
- 4.16. We agree with amendment to policy part (iii) in that improvements could be made to green and blue infrastructure and open space, such as Thornwood Common (referred to above), on the basis that the site is reviewed comprehensively with an amendment to the residential development parcel.
- 4.17. We agree with the mitigation proposals referred to on air quality and recreational pressures. These have been discussed during pre-application discussion with Officers.
- 4.18. We make the point that the Council are promoting large complicated residential allocations in Harlow and Gilston Garden Towns, Epping South, Waltham Abbey North, North Weald, which will take many years to come forward for development. These are complex development sites which are financially challenging and might not come forward for development or alternatively under capacity.
- 4.19. As we stand the Council can only demonstrate 2.43 years of housing (ref appeal decision APP/J1535/W/20/3258787 & APP/J1535/W/20/3263876).
- 4.20. **On this basis we strongly urge the Inspector to review THOR.R2 both text and policy maps**, with the Council to take the opportunity in developing a more positive and effective policy framework for this site. This will help to deliver additional housing, including, affordable housing in a very high value area, as well as improvements to Thornwood Common.

- 4.21. The boundary lines currently drawn within the draft policy maps represents no logical development pattern or Green Belt assessment critique. They have been arbitrarily drawn at THOR.R2. It makes very little sense in Green Belt terms by creating a new fenced boundary through an existing field as referred to in the Site Specific Requirements section.
- 4.22. The applicants position is that the residential development parcel should be amended to a similar depth of site next door at THOR E.1.
- 4.23. MM 192 adds a requirement for the scheme to undertake a design review panel. This is considered very onerous for a single phase site of a relatively small housing development. The applicants have started a pre-application process with the Council through a PPA which is considered an acceptable way to develop the scheme design involvement in collaboration with the Council.
- 4.24. On this basis the draft policy as is currently being amended is not reflective of national planning advice in the NPPF, which asks that policies to be ***'positively prepared'***.
- 4.25. In addition, NPPF para 60 requires the planning system to support ***'the Government's objective of significantly boosting the supply of homes'***. The site can easily accommodate more housing as confirmed above and in the attached, and the proposed main modifications do not result in a positive policy framework for this site.
- 4.26. Thornwood and indeed, Epping Forest as an location, is a very high value area, where there is a significant lack of affordable homes. The subject site could accommodate additional affordable homes for the local community. An increase to circa 70 new homes at THOR.R2 would deliver around 10 extra new homes for the local affordable

housing list. This is considered to be a very significant factor in considering amending the policy as prescribed in these modifications.

5. Summary

- 5.1. These submitted representations support the Council in seeking to deliver new homes across a number of tenures, in a sustainable way.
- 5.2. The current policy we consider is not positively prepared, effective or supported by national policy in that Councils should be seeking to boost the number of new homes through plan making.
- 5.3. The Inspector is respectfully advised that the Council are missing the opportunity to create a better policy framework for this site, and a more comprehensive and well planned residential development at THOR.R2.
- 5.4. We strongly request that these suggestions are built into the discussion with Council and reflected in emerging policy. The site and future development represents a very significant investment to the local community, both at an economic level and a social one, providing market and affordable homes whilst supporting the Local Plan.
- 5.5. We trust these comments are helpful and should any additional information be required please do not hesitate to contact the undersigned at the earliest opportunity.

Yours sincerely

[...Redacted...]

Matthew Corcoran Bsc, MA, MRTPI

Managing Director

CDS Planning