

**Epping Forest District Council**

**Local Plan 2011 - 2033**

**Examination**

**Hearing Statement on behalf of Mr John Padfield (REF: 19LAD0069)**

**Matter 7: Place-shaping and General Masterplan Approach**

**Issue 1: Is the application of Policy SP3 to all allocate sites justified; and is it otherwise effective and consistent with national policy?**

- 1) It is submitted that this form of policy should set out place-making principles for large scale developments where master planning is appropriate to form the basis of new development proposals. However, all policies should provide an appropriate degree of flexibility and not be presented as being tantamount of a prescriptive set of rules.
- 2) The language 'must reflect and demonstrate that the following principles have been adhered to' (emphasis added) is considered inappropriate for development plan policy. As such it is submitted the policy should read:  
  
*'...must reflect the following place making principles with respect to the scale of development proposed'*.
- 3) Planning policies are intended to assist in the development management so that applicants are aware of the required composition of development proposals. Similarly, the wider public has an understanding of the design and place-making expectations from new development proposals. The words '*combining the very best of urban and rural living to promote healthy and active lifestyles and vibrant communities*', is meaningless within a development plan policy.
- 4) For the density of dwellings proposed 1 (ii) it will be impractical to provide 'homes with gardens' in the ordinary understanding of the word 'garden'.
- 5) In the context of H VIII, new built development necessarily brings about change, and as such it cannot be assumed that all development enhances or indeed as a matter of practicality or by design can enhance the natural environment e.g. impact of developing a greenfield site on the landscape.
- 6) The concern regarding the application of the policy to all scales of development is illustrated in criterion ix where reference is made to the delivery of 'shopping' facilities.
- 7) Criterion X assumes that existing neighbours need revitalising? Why should that be the case?

- 8) Criterion XIII is unhelpful within the development management system as no definition is provided as to the meaning of 'strategic destinations' or whether all developments can reasonably provide for sustainable movement and access thereto.
- 9) It is submitted that Policy SP3 should be worded so as to require master planning to have regard to place-making principles, with changes made to the principles so as to maintain proportionality (to the individual circumstances) and flexibility within the development management process.

**Issue 2 (D)**

- 10) These representations are made on behalf of Mr. J Padfield a landowner for the allocation at Epping EP1. Mr. Padfield is actively engaging with other landowners within the allocation and in discussions with the LPA to bring this site forward for development promptly.