

Epping Forest District Council Representations to the Draft Local Plan Consultation 2016 (Regulation 18)

Stakeholder ID	4611	Name	Trevor	Dodkins on behalf of T Evans	Phase 2 on behalf of T Evans
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Date	12/12/2016
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Letter or Email Response:

Introduction These representations to the Draft Regulation 18 Local Plan are submitted on behalf of our clients T Evans, who own land identified as site reference SR-00442 at Marlow at Thornwood Common. The following sections will in addition to outlining our proposal for the residential allocation of **...redacted...**, also respond to matters raised both within the Draft Local Plan itself, and in particular to the evidence base. Our main response will be to chapter 5 in relation in providing more background to the site, and in response to the Arup site assessment in order to demonstrate that the site does not have any insuperable constraints and is deliverable within a quick timescale, ensuring the District's housing needs are met without delay. In particular we will compare this site with the site proposed for allocation within the draft Plan at Tudor House ref SR-0149, and examine inconsistencies in the respective assessments within the Arup report. The Council has set 9 questions as part of this consultation, and for the reasons above we will concentrate on chapter 5 and question 6, as below. Chapter 5 Section 7 - Q6. Do you agree with the proposed sites in your area? (See Chapter 5) The draft Local Plan makes clear that the ARUP Site Selection Report 2016 has informed key decisions in respect of site allocations. We have reviewed the criteria, scores and qualitative assessment within the Arup report, and in particular in relation to the proposed allocation site at Tudor House ref SR-0149, and our clients land at **...redacted...**. We will also make reference to land to the south of our clients site at **...redacted...**. Our response can be set out as follows under the following headings, with reference to the criteria set out in the Arup Assessment relating to both sites. However, at this stage we note from an Arup presentation in the summer that the scores and qualitative assessments are based largely on GIS data "and professional judgement", and this will form the basis of the following, which assesses each criteria within the Site Suitability Assessment. Criteria:

1.1 Impact on Internationally Protected Sites No impact identified, and no comments in response. 1.2 Impact on Nationally Protected sites We note that **...redacted...** scores higher than Tudor House on this criteria as the latter falls within an Impact Risk Zone, unlike **...redacted...**. 1.3a Impact on Ancient Woodland 1.3b Impact on Ancient/Veteran Trees outside of Ancient Woodland 1.4 Impact on Epping Forest Buffer Land No impact identified, and no comments in response. 1.5 Impact on BAP Priority Species or Habitats 1.6 Impact on Local Wildlife Sites We would query the negative assessment on this relating to **...redacted...**, as the 'wholly encompassed Deciduous Woodland' only exists in part and can be retained. As such the score should be neutral. Indeed, it is surprising that the Tudor House site is scored neutrally on impact on LWS given that it is within the 250m buffer for the Thornwood LNR LWS. 1.7 Flood risk Both sites are noted as being located within zone 1 and so no impact. 1.8 a Impact on heritage assets 1.8b Impact on archaeology No impact identified, and no comments in response. 1.9 Impact of air quality 2.1 Level of harm

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to Green Belt No adverse impact identified, and no comments in response. 3.1 Distance to the nearest rail/tube station 3.2 Distance to nearest bus stop 3.3 Distance to employment locations 3.4 Distance to local amenities 3.5 Distance to nearest infant/primary school 3.4 Distance to local amenities 3.7 Distance to nearest GP surgery 3.8 Access to Strategic Road Network No impact identified, and no comments in response. 4.1 Brownfield and Greenfield Land This states that the majority of the site is greenfield land for ...redacted..., and is 300m from the nearest settlement. On the latter point this is not any further than the furthest part of the Tudor House site, and ignores the possibility of the inclusion of brownfield land to the south. On the status of the ...redacted... site, a significant area is brownfield and within an active industrial use that has caused planning problems in the past in terms of noise, activity, and lorry movements that has been the subject of enforcement action but which is lawful following a recent planning Inquiry. This should carry significant weight and at the very least the impact on this ground should be considered to be neutral. As a consequence, for both sites to score the same under this criteria is not credible in the slightest. 4.2 Impact on agricultural land The ...redacted... site does not involve land in agricultural use, or given the nature of landownership, authorised uses etc can be used agriculturally. As such the score should be neutral or positive under this criterion. 4.3 Capacity to improve access to open space No harmful impact identified, and no comments in response. 5.1 Landscape sensitivity 5.2 Settlement character sensitivity 6.1 Topography constraints We note that the scores for the first 2 of these are negative for Tudor House and neutral for ...redacted... . 6.2a Distance to gas and oil pipelines 6.2b Distance to power lines No impact identified, and no comments in response. 6.3 Impact on Tree Preservation Order (TPO) No impact identified, and no comments in response. 6.4 Access to site 6.5 Contamination constraints No impact identified, and no comments in response. 6.6 Traffic impact This scores as neutral for both sites, but given the problems with lorries using the ...redacted... site, the elimination of these and replacement with more appropriate vehicles coupled to an improved junction should be seen as a benefit and therefore a positive score. On Tudor House, this will generate traffic from a greenfield site where is currently no traffic, and so should therefore be a negative score. Summary of Comparative Analysis We attach 2 comparative assessments of the 2 sites within appendices 1 and 2 of this response. The first appendix shows the Arup/Council's scores for both sites, and shows that ...redacted... scores only one lower than Tudor, despite the challenges we have made to some of the assumptions. Appendix 2 shows the scores corrected by ourselves along the lines as set out in our above comments, and shows that ...redacted... scores as plus 3 compared to minus 5 for Tudor House. Summary and Conclusions We therefore object to the proposed allocation of site SR-0149 Land at Tudor House, and instead propose the allocation of land at ...redacted..., together with land to the south if required, on the basis that:

- The allocation of the Tudor House site is not robust and cannot be justified from the evidence base contained within the Arup assessment;
- There are no constraints to development at ...redacted... that cannot be overcome by appropriate mitigation if required at planning application stage, and indeed will lead to significant benefits from the removal of the existing uses on the site which has been given no weight by Arup or the Council;
- The site can deliver housing within a short period of time, as well as contribute positively to the Council's community needs. We have no confidence in the thoroughness and therefore credibility of the Site Deliverability Assessment prepared by Arup, and the qualitative assessment conclusions, which have been challenged as above. We trust the above comments will be taken in to account as the draft Local Plan is progressed. *ATTACHED SITE SUITABILITY ASSESSMENT*

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