

Stakeholder Reference:
Document Reference:

Part A

Making representation as Agent on behalf of Landowner or Land Promoter

	Personal Details	Agent's Details (if applicable)
Title	Mrs	
First Name	Mrs I Alldis, Mr Richard Castle and Mr Andrew Castle	Stephen
Last Name	Mrs I Alldis, Mr Richard Castle and Mr Andrew Castle	Hayhurst
Job Title (where relevant)		Chartered Town Planner
Organisation (where relevant)		Hayhurst Town Planning Services Limited
Address	[REDACTED]	[REDACTED]
Post Code	[REDACTED]	[REDACTED]
Telephone Number	[REDACTED]	[REDACTED]
E-mail Address	[REDACTED]	[REDACTED]

Part B

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph:

Policy: SP 2 Spatial Development Strategy 2011-2033

Policies Map: No

Site Reference: None of the above

Settlement: Thornwood

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: Don't Know

Sound: No

If no, then which of the soundness test(s) does it fail? Justified, Consistent with national policy

Complies with the duty to co-operate? Don't Know

Please give details either 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; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible. Please use this box to set out your comments.

The 2017 update to the SHMA has indicated that the full objectively assessed need for housing in Epping Forest District is 12,573 new homes within the plan period, but the plan only allocates sites for 11,400 new homes. There is plenty of scope for allocating sites, including my clients' land at Thornwood, to meet the full objectively assessed housing need, without causing significant harm to the Green Belt or other key planning constraints. Therefore the proposed allocation is a significant under provision, contrary to paragraph 47 of the NPPF, which requires LPAs to meet the full, objectively assessed needs for market and affordable housing in their areas.

The land hatched in red on the attached plan has an area of about 0.64ha and lies on the eastern side of Duck Lane, Thornwood.

We note that the Council wishes Thornwood to become more self-sustaining in the future with improved provision of services, transport infrastructure and amenities to cater for the existing and future community, as is stated in the "Vision for Thornwood" on p.160 of the plan.

The site was judged both suitable for development and deliverable as part of the 2012 Strategic Land Availability Assessment.

The site has existing development on two sides and is bounded by Woodside on a third. It is therefore well-retailed to the existing village.

Although a small part of the site is in Flood Zone 2, my clients own adjoining land to the east which could provide compensatory flood plain.

New housing on the site would support existing village services, encourage the provision of new local services and generate a proportion of affordable housing for local people.

The site occupies a sustainable development location being no more than 350m from High Road bus services and then only 3.5kms from Harlow and 2km from Epping, with access to tube and rail lines and town centre shops services and facilities.

The income from the development would help my clients fund the repair and maintenance of the Grade II listed, mid-18th century house at Weald Place, which is in desperate need of attention.

Please set out what change(s) you consider necessary to make the Pre Submission 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 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.

Paragraph A of policy SP2 should be amended by increasing the figure of 11,400 to 12,573 to bring it in line with the requirements of paragraph 47 of the NPPF; and the table in SP2B should be amended by increasing the allocated housing for Thornwood to 192 to reflect the capacity of my clients' site and it's suitability for development in line with the Vision for Thornwood.

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 oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph:

Policy: P 11 Thornwood

Policies Map: Yes

Site Reference: None of the above

Settlement: Thornwood

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: Don't Know

Sound: No

If no, then which of the soundness test(s) does it fail? Justified

Complies with the duty to co-operate? Don't Know

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In P11B add site "(iii) THOR.R3 Land East of Weald Place Approximately 20 homes" and on Map 5.17 include housing site allocation THOR.R3 on the land east of Weald Place as identified on attached site location plan.

These changes would assist in the plan meeting the objectively assessed housing need for the District and the Vision for Thornwood on a relatively unconstrained site in a sustainable location.

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 oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination

Yes

Signature: Stephen Hayhurst Date: 19/01/2018