

**Copy and paste everything below this point into Word for the redaction process**

Stakeholder Reference:

Document Reference:

## **Part A**

### **Making representation as Resident or Member of the General Public**

<b>Personal Details</b>	<b>Agent's Details (if applicable)</b>
Title	Mr
First Name	JOE
Last Name	BEVINS
Job Title (where relevant)	
Organisation (where relevant)	
Address	, ,
Post Code	
Telephone Number	
E-mail Address	

## **Part B**

### **REPRESENTATION**

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

Paragraph: STAP.R1

Policy: P 12 Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sheering and Stapleford Abbots

Policies Map: Yes

Site Reference: None of the above

Settlement:

**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? 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.**

This plan is not consistent with national policy for the following reasons:

No consultation was made with relevant stakeholders. Whilst the council holds it has communicated with a large number of people this did not include those villagers directly affected.

The draft local plan in 2016 did not include the Stapleford Abbots site therefore stakeholders in

and around Stapleford Abbots have not been involved at any stage. The current plan was presented on 18 December 2017. 4 days prior to this, 14th December 2017, the Stapleford Abbots site was added.

The draft plan stated that the site in Stapleford Abbots was not considered suitable "the council does not consider that are distinct special options for locating residential development within Stapleford Abbots."

We therefore contest the statement from the council that we have no right to contest the development as we did not respond to the original draft. We would not have responded as Stapleford Abbots was considered unsuitable. As the Stapleford Abbots site has now been added we contest that the consultation as null and void and should be re started or the Stapleford Abbots site removed from the plan.

When requesting of the council why only one known resident received a letter about this development, we were informed that they were on the council data base due to previous correspondence with them about other matters. This is totally unsatisfactory and would suggest

that only people who communicate with the council are informed. Without this resident communicating with others we would still be unaware of what we consider to be in breach of

legal consultation, in that the council did not "undertake stakeholders engagement and consultation."

Furthermore we do not consider that the council has carried out "sustainable appraisal" in that

the 4 aspects of consideration for development in a green belt area have not been met.

- Under the 1st green belt purpose, the proposed development creates unrestricted sprawl of

large built up areas. In line with the rating for parcel 033.1( Kensington Park) this would at least score 3/5.

- Under the 2nd green belt purpose preventing neighbouring towns from merging into one another, we would argue that this would score 5/5 as it would join the villages of Stapleford

Abbots and Havering Atte Bower.

- Under the 3rd green belt principle assist in safeguarding the countryside from encroachment;

in-line with parcel 033.1, ( Kensington Park) we consider the propose site to score 5/5.

• Under the 4th green belt principle to preserve the special character of historic towns, it is harder to comment as we have no local benchmark. This is however a large visible area with

many houses overlooking historical views which would be removed by this development. Under this principle we would consider this to score highly.

Finally on the third criteria for legal policy compliance Identifying and resolving significant crossboundary

issues, and demonstrating the Council has met its Duty to Cooperate:

The proposed site sits on the borders of Epping Forest district council and London Borough of

Havering. Access points would cause congestion on the only single lane road joining these and

stakeholders have not been consulted about this. Increasing the size of the road is not an option

as it would affect the historical nature of the villages. We cannot see how access and egress

can be safely managed in the Stapleford Abbots nor the Havering section of the plot, due to

the sharp blind bend on the border of the two villages.

For all of the above we vehemently oppose the development of a housing estate in Stapleford

Abbots.

Other areas for consideration:

- Flood issues from building on land near to a Brook.
- Main drains which currently cannot manage with the existing residential capacity.
- Village school can not accommodate more pupils currently with children taught in portacabin accommodation.
- Concerns with increased issues with power when the village has regular power cuts.
- An already dangerous junction at Tysea Hill with impaired vision.

**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.**

This plan is not consistent with national policy for the following reasons:

No consultation was made with relevant stakeholders. Whilst the council holds it has communicated with a large number of people this did not include those villagers directly affected.

The draft local plan in 2016 did not include the Stapleford Abbots site therefore stakeholders in

and around Stapleford Abbots have not been involved at any stage. The current plan was presented on 18 December 2017. 4 days prior to this, 14th December 2017, the Stapleford Abbots site was added.

The draft plan stated that the site in Stapleford Abbots was not considered suitable "the council does not consider that are distinct special options for locating residential development within Stapleford Abbots."

We therefore contest the statement from the council that we have no right to contest the development as we did not respond to the original draft. We would not have responded as Stapleford Abbots was considered unsuitable. As the Stapleford Abbots site has now been added we contest that the consultation as null and void and should be re started or the Stapleford Abbots site removed from the plan.

When requesting of the council why only one known resident received a letter about this development, we were informed that they were on the council data base due to previous correspondence with them about other matters. This is totally unsatisfactory and would suggest

that only people who communicate with the council are informed. Without this resident communicating with others we would still be unaware of what we consider to be in breach of

legal consultation, in that the council did not "undertake stakeholders engagement and consultation."

Furthermore we do not consider that the council has carried out "sustainable appraisal" in that

the 4 aspects of consideration for development in a green belt area have not been met.

- Under the 1st green belt purpose, the proposed development creates unrestricted sprawl of

large built up areas. In line with the rating for parcel 033.1( Kensington Park) this would at least score 3/5.

- Under the 2nd green belt purpose preventing neighbouring towns from merging into one another, we would argue that this would score 5/5 as it would join the villages of Stapleford

Abbots and Havering Atte Bower.

- Under the 3rd green belt principle assist in safeguarding the countryside from encroachment;

in-line with parcel 033.1, ( Kensington Park) we consider the propose site to score 5/5.

- Under the 4th green belt principle to preserve the special character of historic towns, it is harder to comment as we have no local benchmark. This is however a large visible area with

many houses overlooking historical views which would be removed by this development.

Under this principle we would consider this to score highly.

Finally on the third criteria for legal policy compliance Identifying and resolving significant

crossboundary

issues, and demonstrating the Council has met its Duty to Cooperate:

The proposed site sits on the borders of Epping Forest district council and London Borough of

Havering. Access points would cause congestion on the only single lane road joining these and

stakeholders have not been consulted about this. Increasing the size of the road is not an option

as it would affect the historical nature of the villages. We cannot see how access and egress

can be safely managed in the Stapleford Abbots nor the Havering section of the plot, due to

the sharp blind bend on the border of the two villages.

For all of the above we vehemently oppose the development of a housing estate in Stapleford

Abbots.

Other areas for consideration:

- Flood issues from building on land near to a Brook.
- Main drains which currently cannot manage with the existing residential capacity.
- Village school can not accommodate more pupils currently with children taught in portacabin accommodation.
- Concerns with increased issues with power when the village has regular power cuts.
- An already dangerous junction at Tysea Hill with impaired vision.

**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: JOE BEVINS Date: 22/01/2018

#### DISCLAIMER

This email is for the use of the intended recipients only. Any opinion or advice it contains is that of the sender and does not bind the authority in any way. If you have received it in error, please notify the sender immediately and then delete the message. If you are not the intended recipient you must not use, disclose, copy or distribute this email. We have taken precautions to minimise the risk of transmitting

software viruses, but we advise that you carry out your own virus checks on an attachment to this message. We cannot accept liability for any loss or damage caused by software viruses.

Internet email is not a secure communication medium, and we advise that you observe this lack of security when emailing us.

Epping Forest District Council  
[Postmaster@Eppingforestdc.gov.uk](mailto:Postmaster@Eppingforestdc.gov.uk)