

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	
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Part B

REPRESENTATION

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

Paragraph:

Policy: P 1 Epping

Policies Map:

Site Reference: None of the above

Settlement: Epping

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

Legally compliant: Yes

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? Yes

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 proposed housing allocations for Epping are unsound as they are not the most suitable sites when considered against reasonable alternatives, the draft plan is therefore not justified. The draft plan is also not consistent with national policy as the most sustainable sites have not been chosen.

My client owns Pound Field, Bell Common, a site which is suitable, available and deliverable for residential development.

The whole of Pound Field, Bell Common, has been assessed under the Stage 2 Site Suitability Assessment by ARUP (ref: SR-0087).

In the ARUP Assessment Pound Field scored positively in relation to its distance to the nearest bus stop, employment opportunities and schools. It also scores neutrally in relation to distance to the nearest rail/tube, local amenities and GP surgery. This is better than some of the designated sites such as Land at Ivy Chimneys Road (EPP.R1) and Land to the South of Brook Road (EPP.R2). Pound Field should therefore be considered to be a sustainable location.

Pound Field is well connected to existing housing and it is our opinion that, in order for the strategic review of housing in Epping to be sound, consideration should be given to including Bell Common within the Epping Boundary.

We note that the site scores negatively in relation to impact on local wildlife sites. We would like to draw your attention to the Ecological Appraisal by Greengage which we submitted with the Community Choices Consultation (attached again for information). This concluded that the northern and north-western areas are less ecologically valuable than the remainder of the site and therefore a small level of development will not significantly impact the remainder of the site's importance dependent upon in the inclusion of mitigation measures. It is therefore proposed that the smaller site, put forward in the Greengage Report, is considered as part of the local plan process.

The proposed development at Pound Field would have a lesser impact on the green belt than the proposed extension to the south of Epping. With Bell Common taken into consideration, Pound Field is no further north, east, south or west than existing housing development. Indeed, this is recognised in Figure 4.3 of the Epping Forest Green Belt Study which finds that the area of Pound Field only performs a 'moderate' function in relation to Green Belt Purpose 3 'Assist in safeguarding the countryside from encroachment' compared with land to the south of Epping which performs a 'strong' function. Furthermore, it is unclear why this function of the green belt is given lesser weight than the other functions.

We also question the deliverability of some of the sites chosen within the existing built up area of Epping. Particularly the sports centre site (EPP.R5) which requires that development will not take place until an alternative sports/leisure facility is delivered and operational and Cottis Lane car park and Bakers Lane car park (EPP.R6 and R7) which require reprovion of the same number of spaces to achieve a relatively small number of dwellings.

The proposed housing designations for Epping are therefore unsound as sites such as the northern and north-western areas of Pound Field are better suited for development.

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.

The housing allocations of Epping must be reconsidered. In particular the designation of northern and north-western areas of Pound Field as shown on the submitted site location plan should be allocated for housing.

Furthermore Bell Common should be included within the settlement boundary.

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral part of the oral examination

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

The housing allocations for Epping require oral discussion at the examination.

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

Yes

Signature: Kate Matthews Date: 24/01/2018