

Stakeholder Reference:

Document Reference:

Part A

Making representation as Statutory Consultee, Local Authority or Town and Parish Council

	Personal Details	Agent's Details (if applicable)
Title	Mrs	
First Name	Elizabeth	
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Part B

REPRESENTATION

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

Paragraph: 5.154 - 5.157

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

Policies Map: Yes

Site Reference: STAP.R1

Settlement: Stapleford Abbots

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

Legally compliant: No

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? No

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

- EFDC comment is that it communicated with a large amount of people, but this did not include the villagers upon whom the impact would be greatest.
- The draft local plan (2016) did not include the Stapleford Abbots site so stakeholders from the Stapleford Abbots area were not involved. The current plan appeared on 18 December 2017 – the Stapleford Abbots site was added four days earlier on 14th December 2017.
- The draft plan's view was that the Stapleford Abbots site wasn't considered suitable: "The Council does not consider that are distinct special options for locating residential development within Stapleford Abbots."
- We refute the statement from EFDC that we have no right to contest the development as we did not respond to the original draft. We would not have responded at that time because at that point, Stapleford Abbots was considered unsuitable.
- As the Stapleford Abbots site is now included, we contest that this action renders the consultation null and void and should either be re-started or the Stapleford Abbots site removed from the plan.
- EFDC were asked why only one known resident received a letter about this development; the responded this person was on the council database due to previous correspondence with them about other matters. This is unsound, implying that only people who communicate with EFDC are informed. If this resident had not spread the word, no other resident would know that EFDC did not "undertake stakeholders engagement and consultation."
- We as a Parish Council would like to know why we were not informed about changes to the Plan.

We do not consider EFDC to have carried out "sustainable appraisal" – namely, the four aspects of consideration for development in a Green Belt area have not been met.

- The proposed development creates rather than contains unrestricted sprawl of large built up areas.
- Preventing neighbouring towns from merging: the development would join the villages of Stapleford Abbots and Havering Atte Bower.
- We do not consider the condition of safeguarding the countryside from encroachment to have been met. Preservation of the special character of historic towns: the local flora, fauna, historical views and potentially items of historical interest would be removed or impaired by this development. Over many decades the field has only been used for grazing, in the first place by cattle, and later by horses. During these years no fertilizers, insecticides or pesticides have been used.

In the matter of identifying and resolving significant cross-boundary issues, and demonstrating the Council has met its Duty to Cooperate:

The proposed site is on the border of Epping Forest District and London Borough of Havering. Access points would cause congestion on the one single-lane road that joins these areas. The only access to the site is via Oak Hill Road, which is entirely in Stapleford Abbots. The whole frontage is a sharp bend and the current entrance is a farm gate with a dropped kerb and joins the road at the sharpest part of the bend. If this was used to access the site, it would create a staggered junction with Tysea Hill, and the approaching traffic from Havering Atte Bower would be unseen to traffic leaving the site. No stakeholders have been consulted about this.

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 missing unpublished document is relating to a re-assessment of viability of this site.

The Parish Council were told this would be added as an appendage at a later date. This means that it cannot be scrutinised as part of the Local Plan, and therefore cannot be used as evidence to support the change of Assessment from Stage 2 to Stage 4. We believe that, without this vital document, the Local Plan should not include this site as viable as no evidence supports any change from Stage 2 which was declared at Local Plan Meetings as being unviable.

Regarding our response to EFDC, we reserve the right to add to our initial objection; the EFDC officer we opened a dialogue with has already admitted that some of the information regarding the site has yet to be published. Again, we are forced to question the management of this proposal and its soundness. We are also interested to know if site's promotor is the actual owner –who would naturally wish to forward a good proposal. We wonder if this is how sites have been identified throughout the Plan's consultation, and how sound it is as a criterion.

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 Parish Council were not consulted about this site and wish to put their case forward about it; if this must be done verbally we are willing to do so.

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

Yes

Signature: E Thomas Date: 28/01/2018