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250 Avenue West
Skyline 120
Great Notley
Braintree
Essex
CM77 7AA

01376 329059
office@phase2planning.co.uk
www.phase2planning.co.uk

Epping Forest District Draft Local Plan 2018 Submission Version Response on Behalf of J & J Sear Land at Coppice Farm, Theydon Bois [Site SR-0080](#)

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Introduction

These representations to the Submission Draft Local Plan are submitted on behalf of our clients, J & J Sear, who own land identified as site reference SR-0080 at Coppice Farm, Theydon Bois. The site is shown on the plan attached as appendix 1 to this response.

In accordance with previous representations to the Local Plan & Call for Sites submissions, we continue to argue the case that this site be allocated for housing, in particular given that the allocations for Theydon Bois – a large village with schools, shops, and good public transport links including a London tube station – have dropped significantly between the Reg 18 draft and currently.

The following sections will in addition to outlining our proposal for the residential allocation of SR-0080, also respond to matters raised within the Submission Draft Local Plan itself, in particular the change in strategy relating to Theydon Bois, and to the evidence base.

Our main response to the Reg 18 draft of the Local Plan related to the 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. To avoid duplication, a copy of those representations is attached as appendix 2, as they address site specific matters.

Policy SP 2 Spatial Development Strategy 2011-2033

This policy sets out a strategy which does not rely on the scale or sustainability of settlement types, but instead a reliance on a sequence of locations dictated by flood risk, open spaces, brownfield land, Green Belt etc. As set out above, there has been a number of changes in the distribution and location of allocated sites since the Reg 18 consultation, but it is not clear from the evidence base how the changes have been justified, given that the sequential approach factors are relatively fixed and have not changed between consultations.



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In particular, when Phase 2 Planning questioned officers during the current consultation, they pointed to a 'frequently asked question' on their consultation website which states:

"I cannot find details in the evidence base as to why individual sites have been discounted by the Council. When will the remaining appendices to the Site Selection Report be made available?"

The Site Selection Report has been published by the Council as part of the Regulation 19 Publication of the Local Plan Submission Version. However, the Council is yet to publish all of the detailed appendices which accompany the Site Selection Report and provide details relating to the assessment of individual sites. This does not mean that this assessment work has not been completed, but rather the delay in the publication of the appendices is due to the time it takes to generate the pro forma for each site, including the mapping for each site, all of which must be checked for accuracy before publication. These appendices will be published by the Council prior to the Submission of the Local Plan for Independent Examination.

The Council considers that the suite of evidence base documents available is adequate and sufficient to enable those wishing to make representations on the Local Plan Submission Version to do so. The information currently available concerning the sites allocated in the Local Plan Submission Version is sufficient to allow any disappointed party promoting non-allocated sites to make representations as to the comparative merits of allocating the promoted site. However, for the avoidance of doubt, the Council will bring the publication of the remaining appendices to the attention of the Planning Inspector appointed to examine the Plan to ensure that the issue can be considered appropriately through the Independent Examination process."

In our view, it is impossible to make any sense of the changes to the Plan and the justification for the introduction of new sites and deletion of those previously proposed, without sight of this key part of the Council's evidence base. In our view, it is testimony to the Submission draft being rushed to avoid any increase in housing numbers as a result of the Government's consultation on standard method for calculating local authorities' housing need (*Planning for the Right Homes in the Right Places: Consultation Proposals Sept 2017*), which suggested an increased annual requirement from 514 to 923 dwellings based on the standard methodology. This was proposed to be brought in by 31st March for those authorities that were not advanced with their Local Plans.

As evidence of this, at the Special Council meeting of 14th December 2017, Members were advised by legal Counsel that due to this, the Council must not generate a need for further consultation with the Plan, and that no additions or deletion of sites could take place without such a need being generated (https://eppingforestdc.public-i.tv/core/portal/webcast_interactive/323384).

Notwithstanding this, we have concerns over the order of the factors within the sequential approach, in particular the identification of previously developed land in the Green Belt, as is the case with a substantial part of our clients land, below the use of urban open spaces, and the inclusion of greenfield Green Belt land only one below brownfield GB land, and again below urban open spaces. This has generated considerable objection within those settlements affected by the loss of valued open spaces, which are clearly more sensitive than the loss of brownfield sites within the Green Belt.



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As a consequence, we consider that the Plan is not sound and object to Policy SP2 on this basis.

Policy P8: Theydon Bois

Under this section, the Council makes reference to Theydon Bois within its Vision for Theydon Bois as being to maintain its local feel and character and preserve its rural setting. This is not a planning criterion, nor is the reference in the text to dark skies policy. It does not justify a very limited allocation to Theydon Bois given its size and excellent sustainability credentials.

We examine the allocations below, but consider that as a result of the flawed development strategy, and the artificial unjustified limitations to growth within Policy P8, then the policy is not sound as a consequence.

Appendix 6: Site Specific Requirements for Site Allocations (Theydon Bois)

With regard to the 3 allocations proposed, these are proposed to be developed at densities between 40 and 59 dwellings per hectare, which in our view, particularly with the THYB.R3 site is far in excess of densities in the surrounding area, with no justification provided for these densities. An average density of 30 dwellings per hectare, which is a recognised norm, would only generate 40 dwellings instead of 62, an unjustifiably limited amount given the status of Theydon Bois as a large sustainable settlement as highlighted above.

Summary and Conclusions

We therefore object to the relevant sections and policies of the Submission Plan as highlighted above, and do not consider the Plan to be sound as a consequence as it relates to Theydon Bois. The Plan should be amended by re-ordering the sequential site selection; take account of a settlement's sustainability; and should allocate our clients land as a consequence.

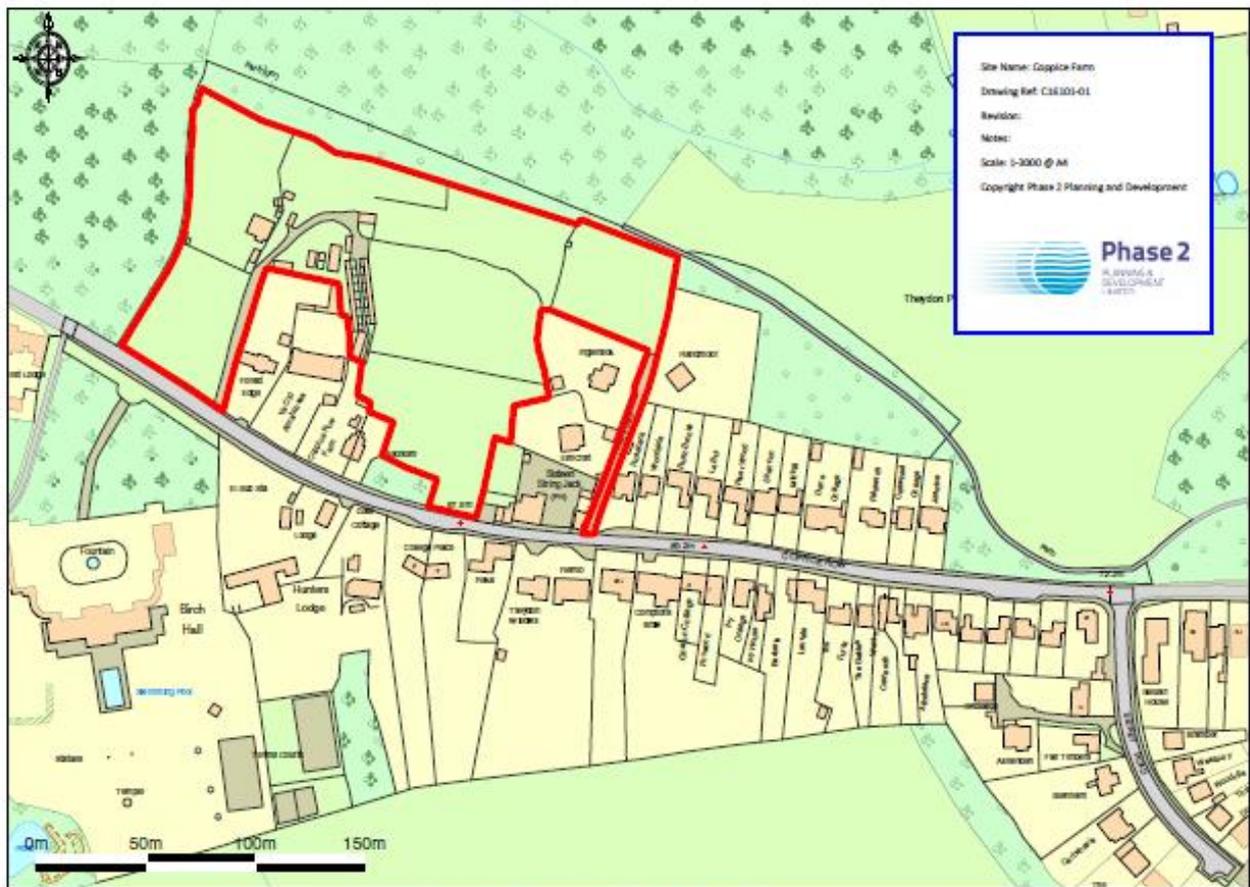
We trust the above comments will be taken in to account as the draft Local Plan is progressed, and would welcome attending and contributing to the Examination.



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Appendix 1 Site Location Plan



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Appendix 2

Previous Reg 18 Representations