

.....Redacted.....

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Subject: FW: Land at Temple Farm, Roydon

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From: David Coleman [<mailto:dcoleman@eppingforestdc.gov.uk>]  
Sent: 15 January 2018 18:11  
To: John Richards <[jrichards@dandara.com](mailto:jrichards@dandara.com)>  
Cc: LDFconsult <[LDFconsult@eppingforestdc.gov.uk](mailto:LDFconsult@eppingforestdc.gov.uk)>  
Subject: RE: Land at Temple Farm, Roydon

John

The evidence base provides justification as to why the Local Plan provides the most appropriate strategy when considered against reasonable alternatives. A detailed explanation and justification for why individual sites, including land at Temple Farm, have not been included in the Local Plan is not set out within the evidence base. National planning policy and the regulations do not require the Council to publish this information, but as outlined below, the Council will be publishing further information on discounted sites prior to Submission in the interests of transparency and best practice.

In addition, please note the following four further points:

- Firstly, the statutory requirement is "publication" not consultation;
- Secondly, the purpose of publication is to allow Regulation 20 representations to be made about the [Local Plan Submission Version](#) — not the version of a plan land owners/promoters would prefer;
- Thirdly, Regulation 20 representations primarily should address soundness, legal compliance and the duty to co-operate — the three matters to be considered by the inspector appointed to examine the Local Plan under section 20 of the 2004 Act; and
- Finally, your concerns relate to soundness only (as per your email below from 10 January) — the reasons why the site has been discounted do not go to soundness.

I trust that this is clear, and taken together with my earlier responses, I trust that this fully and comprehensively answers your questions.

Kind regards  
David

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From: John Richards [<mailto:jrichards@dandara.com>]  
Sent: Monday, January 15, 2018 16:17  
To: David Coleman  
Cc: LDFconsult  
Subject: RE: Land at Temple Farm, Roydon

David,

I'm sorry to press on this point but I'm going to ask a very simple question – reviewing the evidence base to the Local Plan currently available can I or can I not determine why land at Temple Farm has been excluded from consideration as a potential strategic site. If so, can you please let me know where?

At the present time, as I understand it, I simply cannot determine why the Council has excluded the site from consideration which I think is a fairly fundamental aspect of your statutory obligation to consult.

Kind regards,

**John Richards**

Associate Director, Planning MRTPI



**Direct:** 01442 838135 • **Mobile:** 07525 593381

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Dandara Hemel Hempstead, KD Tower, Cotterells, Hemel Hempstead, Hertfordshire, HP1 1FW

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**From:** David Coleman [<mailto:dcoleman@eppingforestdc.gov.uk>]

**Sent:** 15 January 2018 14:30

**To:** John Richards <[jrichards@dandara.com](mailto:jrichards@dandara.com)>

**Cc:** LDFconsult <[LDFconsult@eppingforestdc.gov.uk](mailto:LDFconsult@eppingforestdc.gov.uk)>

**Subject:** RE: Land at Temple Farm, Roydon

Dear John

Apologies for the slight delay in responding to you.

Addressing each of your comments concerning soundness in turn:

- I. Whilst we understand the difficulties you have identified arising from the unavailability of some of the appendices to the Site Selection Report, we do not agree that their unavailability at this stage makes it impossible to submit informed representations to the Plan. 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.
- II. As the Site Selection Report makes clear, we are in the process of finalising the detailed write-up of the appendices. For the avoidance of doubt, the Council does not concede that the said additional site assessment work has not been completed. 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. The Council specifically denies that we have not completed our assessment of all sites, or that the Local Plan Submission Version cannot be considered 'justified' within the meaning of soundness as defined within paragraph 182 of the Framework.
- III. It is no secret that a key driver for the publication of the Local Plan Submission Version is to ensure that the Council can submit the document to the Secretary of State for Independent Examination before 31 March 2018. As you know, that is a product of the Secretary of State's indicated change in policy regarding the standardised methodology for objectively assessed need for housing in September 2017. Whilst the decision to amend the Council's Local Development Scheme has truncated the period available to prepare the Local Plan Submission Version, we specifically deny that the decision has compromised the Council's ability to objectively assess new and amended sites. Moreover, in all the circumstances, the Council considers the suite of evidence base documents available to be adequate and sufficient to enable those wishing to make Regulation 20 representations to do so.

For these reasons and those set out in our previous correspondence, the Council will not accede to your request to publish the additional site selection work this week, nor extend the Regulation 19 publication period by a minimum of two weeks, or otherwise.

The remaining appendices to the Site Selection Report will be made available to the Council prior to the Submission of the Local Plan. Unfortunately, given the very limited time available to prepare the submission documents, extending the Regulation 19 publication period will not be possible.

We accept that this situation is not ideal but we do not consider that you, or any other interested party, cannot make valid or meaningful Regulation 20 representations, or that you, or any other interested party will be prejudiced in the conduct of the independent examination of the Local Plan.

For the avoidance of doubt, the Council will work with the Planning Inspector appointed to examine the Local Plan Submission Version to ensure disappointed promoters of the non-allocated sites are afforded a proper opportunity to make such representations as the Inspector considers reasonable in the circumstances.

Kind regards  
David

David Coleman

Planning Policy Manager | Planning Policy | 01992 564517  
Epping Forest District Council | Civic Offices | 323 High Street | Epping | Essex | CM16 4BZ

**Please note our reception opening times are now: 9:00am - 1:00pm**

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[Countrycare](#) - Epping Forest District Council's award winning Countryside Management Service.

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**From:** John Richards [<mailto:jrichards@dandara.com>]

**Sent:** Friday, January 12, 2018 09:08

**To:** LDFconsult

**Cc:** David Coleman

**Subject:** RE: Land at Temple Farm, Roydon

**Importance:** High

Dear Sir / Madam,

Please can you come back to me on this.

The simple point is that we need to know why site ref. SR-0303-N has not be chosen for allocation ahead of those set out in your current draft Plan. As the site specific assessment work presumably informed your revised Plan, this should be easily available.

There is just over two weeks until the end of the consultation and would reiterate the point made in my final paragraph below.

Kind regards,

**John Richards**

Associate Director, Planning MRTPI



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From: John Richards  
Sent: 10 January 2018 14:58  
To: LDFconsult <[LDFconsult@eppingforestdc.gov.uk](mailto:LDFconsult@eppingforestdc.gov.uk)>  
Cc: David Coleman <[dcoleman@eppingforestdc.gov.uk](mailto:dcoleman@eppingforestdc.gov.uk)>  
Subject: RE: Land at Temple Farm, Roydon  
Importance: High

Dear Sir / Madam,

Thank you for your response.

In your first paragraph you clearly state *"all of the evidence used by the Council to formulate the Plan is available from the Council's website"*.

You then go on in your second paragraph to concede that the site assessment evidence base for those new and amended sites which were considered by the Council between 18<sup>th</sup> May 2016 and 31<sup>st</sup> March 2017, including Temple Farm ref. SR-0303-N, is not currently available, with *"the Council currently finalising the detailed write-up of the site selection appendices to the Report on Site Selection (2017)"*. Given that the site was originally incorrectly assessed by the Council, with an apology provided by the Council in recognition of this dated 14th November 2016 (see attached), it is incredibly frustrating and disappointing that the Local Plan is being consulted upon without a full site selection evidence base.

There are a number of clear soundness issues here:

- (i) Whilst one is able to understand the site selection methodology and general approach, it is currently impossible to understand why the Council has rejected or chosen individual sites for development because the detailed site selection proforma is not available. This makes it impossible to submit informed representations to the Plan which assess the soundness of selecting certain sites for development over others applying the methodology set out in your Report on Site Selection;
- (ii) If you are finalising the detailed write-up of the appendices and they are not to be available this month, are you conceding that this additional site assessment work has not been completed? This certainly appears to be the case and suggests that your Plan cannot possibly be considered 'justified' as you have not completed your assessment of all sites and therefore your proposed spatial strategy and allocations cannot be considered the most appropriate when considered against the alternatives – put simply, you have published your Plan without completing your assessment of all alternatives;
- (iii) As you have conceded in your 12<sup>th</sup> October 2017 Report to Cabinet, a key driver for the publication of your Submission Version Local Plan is to ensure you can submit the document to the SoS for examination before 31<sup>st</sup> March 2018. We are concerned that by amending your previously published LDS to specifically meet this deadline, you have compromised not only the ability to objectively assess new and amended sites, but are not even in a position to be able to publish a full suite of evidence base documents, required to understand the process of site selection, and critical to the community's and land owners ability to prepare fully considered representations.

I am formally requesting that either the Council publishes the site selection evidence base this week or extends the consultation period by a minimum of two weeks from the date that this evidence base is available. Otherwise you are fundamentally prejudicing and restricting the ability of respondents to understand the Council's rationale, thought process and methodology underpinning the selection of sites for allocation and the rejection of others.

I look forward to your response.

**John Richards**

Associate Director, Planning MRTPI



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**From:** LDFconsult [<mailto:LDFconsult@eppingforestdc.gov.uk>]

**Sent:** 10 January 2018 14:09

**To:** John Richards <[jrichards@dandara.com](mailto:jrichards@dandara.com)>

**Cc:** David Coleman <[dcoleman@eppingforestdc.gov.uk](mailto:dcoleman@eppingforestdc.gov.uk)>

**Subject:** RE: Land at Temple Farm, Roydon

Dear John

Thank you for your email. All of the evidence used by the Council to formulate the Plan is available from the Council's website. As you will appreciate, the evidence base supporting the Local Plan is and will continue to evolve. I would therefore urge you to submit your representation(s) to the Council during the Publication period based upon the information available, explaining why you consider / do not consider the Local Plan to be sound and / or legally compliant. Your representations will then be considered through the Independent Examination.

All relevant available documents can be found on the Council's website under the Technical Information page. This includes the two updated site selection methodologies (2017) used to identify residential, employment and traveller sites and the Report on Site Selection (2016) with appendices. The 2016 Report on Site Selection sets out the assessment of all sites promoted to the Council up to 17 May 2016. The Report on Site Selection (2017), which is available to view on the Council's website, provides an overview of the additional assessment undertaken by the Council in 2017. Any new or amended sites promoted to the Council between 18 May 2016 and 31 March 2017 have also been assessed – this includes your site SR-0303-N. The site selection process has now been concluded and the outcomes of this work reflected in the Submission Version of the Local Plan. The Council is currently finalising the detailed write-up of the site selection appendices to the Report on Site Selection (2017). The Council will make the write-up of these available as soon as possible but this is unlikely to be before the end of the Publication period. Clearly the write-up will not change the Submission Version of the Local Plan.

I would suggest referring to the full Sustainability Appraisal which provides further details and justification for the approach taken in the Submission Version of the Plan:

<http://www.efdclocalplan.org/wp-content/uploads/2017/12/Sustainability-and-Equalities-Impact-Appraisal-AECOM-December-2017-EB204.pdf>

As you are aware the Site Selection report can be found at:

[http://www.efdclocalplan.org/wp-content/uploads/2017/12/20171212\\_Report-on-Site-Selection\\_Issue-EB802B.pdf](http://www.efdclocalplan.org/wp-content/uploads/2017/12/20171212_Report-on-Site-Selection_Issue-EB802B.pdf)

Kind regards

Planning Policy Officer

Planning Policy Officer | Planning Policy | 01992564517  
Epping Forest District Council | Civic Offices | 323 High Street | Epping | Essex | CM16 4BZ

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**From:** John Richards [<mailto:jrichards@dandara.com>]

**Sent:** Friday, January 5, 2018 15:36

**To:** David Coleman

**Cc:** William Marr-Heenan; Nigel Richardson; Nick Smithson

**Subject:** RE: Land at Temple Farm, Roydon

**Importance:** High

David,

Please can you come back to me on this please as time is of the essence.

Hopefully you agree that it is vital for consultees to understand the rationale and justification behind the Council's site selection process especially when one of your stated aims of the current draft was to reassess sites which had either not been subject to assessment previously or had undergone material changes to the extent of land being promoted.

Could you come back as a priority please, even if just an update as to your enquiries on the matter.

Thank you in advance.

**John Richards**

Associate Director, Planning MRTPI



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**From:** John Richards

**Sent:** 02 January 2018 16:15

**To:** 'David Coleman' <[dcoleman@eppingforestdc.gov.uk](mailto:dcoleman@eppingforestdc.gov.uk)>

**Cc:** William Marr-Heenan <[wmarrheenan@eppingforestdc.gov.uk](mailto:wmarrheenan@eppingforestdc.gov.uk)>; Nigel Richardson

<[NRichardson@eppingforestdc.gov.uk](mailto:NRichardson@eppingforestdc.gov.uk)>; Nick Smithson <[nsmithson@eppingforestdc.gov.uk](mailto:nsmithson@eppingforestdc.gov.uk)>

**Subject:** RE: Land at Temple Farm, Roydon

**Importance:** High

David,

I am starting to go through the evidence base for the Submission Version Local Plan and particularly Appendix B of the Arup 2017 Site Selection Report which reassessed land at Temple Farm, Roydon. I can't seem to find Appendix B which is obviously critical to our representations to understand why the Council has not chosen to allocate the site given the representations we made to the previous iteration of the Local Plan including the identification of previous deficiencies regarding assessment.

Could you point me in the right direction please.

Thanks.

**John Richards**

Associate Director, Planning MRTPI



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