

[REDACTED]

From: [REDACTED]
Sent: 23 April 2018 16:48
To: LDFconsult
Subject: RE: Epping Forest District Local Plan Submission Version 2017 Site 0968
Attachments: RE: Site at Sheering - Lower Sheering - Land to rear of Luxford Place, East of the River Stort; RE: Site at Sheering - Lower Sheering - Land to rear of Luxford Place, East of the River Stort

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Epping

I would like to maintain my previous Representation [REDACTED] for this 0.3ha site. In essence this is that the plan process was unsound if the site was excluded because I stated that it could deliver 5 houses: the ARUP Report on site selection excluded the land even though it exceeded the minimum criteria 0.2ha, their methodology stating that site of 6 houses or 0.2ha would be included for assessment.

I now see with the post consultation published assessment by ARUP that the site was excluded at Stage 1 because it fell outside the Settlement Buffer Zone. I am therefore somewhat bemused as to whether the 2017 grounds for exclusion remain pertinent behind the scenes of the Justification column or not

As per my unanswered question in the second email attached, Site 0032 a short distance to the north on the edge of Lower Sheering did go forward even though it is I understand also outside the Buffer Zone. In respect of preventing sprawl in the Green Belt SR0032 is categorised as performing better.

I argue the Buffer Zone concept is non-statutory and arbitrary. Lower Sheering whilst classified as a Hamlet in the Green Belt Review 2015, in the Local Plan review is acknowledged as a difficult settlement to categorise as it draws all its services from Sawbridgeworth across the County boundary to the west. The latter acknowledges further work would need to be done working jointly with East Herts. This has not been done to my knowledge.

6.1 of the Green Belt Review acknowledges sites such as this with a direct relationship with a settlement need looking at in more detail. It states that such 'disguised' small parcels within the Green Belt notated locational areas categorised may perform differently to the larger parcel. It states the strategic nature of the Green Belt policy cannot be assessed in isolation of other available evidence. The paragraph states that these smaller areas should be assessed in more detail. I do not consider that has been done.

Firstly I am alerted by the fact that AMEC notified the Council that the parcel should correctly be described as east of the River Stort, as opposed to west: that makes me think close attention has not been paid.

The land to the east was developed by Persimmon for about 50 homes in the early 2000s. There are two houses now immediately to the north, one in construction. The land is restored former glass houses land in rough grass. It is all in FR1 as originally represented. It is easily walkable to the train and shops, schools etc You can see by looking at the plan of the development east it could easily accommodate 6 houses backing on of similar size.

In the Green Belt review it is the slim tip at the top of DSR001. It is bounded to the south from DSR001 by a strong hedge and ditch. It has none of the character of the wider 25 ha of DSR001. It performs weakly in terms of preserving a

setting of an historic town. The main purpose of DSR001 is stated as preventing against the sprawl of Harlow well to the south. The main stated characteristic of DSR001 is typical open arable fields. Clearly this is not that.

Neither the Green Belt Review nor the Local Plan Review have properly looked at the performance of this land at granular level, either in relation to the existing settlement and services, nor the Green Belt as acknowledged ought to be considered.

I would point out the Government announcement of late aspiring to have 20% of our housing need made up of small sites of sub 0.5ha. Epping has a house numbers problem, and it seems to have fitted its selected evidence base around its conclusions: a little more work on the small sites, and consistency of treatment could in aggregate deliver significant additional houses on sites such as this that neatly fit in to settlement framework without transgressing out in to strategic Green Belt. If this site is not removed from the Green Belt the Council will have an excuse not to support its development if it comes forward as a windfall – on which they hope to rely which is unrealistic given the predominance of Green Belt, so every little opportunity like this needs a proper magnifying glass.

The Policy covering Lower Sheering is unsound as it has not considered all reasonable alternatives or options in seeking to allocate land. It is unsound because it has not properly justified exclusion of this parcel that can deliver 6 or more houses. It is unsound to the extent that it has inconsistently allocated a site of similar size just to the north. The Site Selection process has not followed through on its stated need in tow documents in effect for further detailed work, and so has not come up with the most appropriate strategy.

I will maintain at the Local Plan Examination in Public that logically the whole site should be excluded from the Green Belt (as the Persimmon site was) so the defensible long term Green Belt boundary follows the same strong hedge-line running east-west along its southern boundary ie the tiny fingertip is removed.

Yours sincerely



From: LDFconsult [mailto:LDFconsult@eppingforestdc.gov.uk]
Sent: 26 March 2018 10:43
To: undisclosed-recipients:
Subject: Epping Forest District Local Plan Submission Version 2017

Dear Consultee,

Please see attached letter if you wish to supplement your Regulation 20 representations to the Epping Forest District Local Plan Submission Version 2017.

Please note, representations must be received by the Council by **5pm on Monday 23 April 2018**.

Kind regards,

Planning Policy Team

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

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