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Our Ref: AB/gc

23rd April 2018

Dear Sir/Madam

Epping Forest District Local Plan Submission Version 2017 – Regulation 20 Representations – Land at North Weald Bassett, South of Vicarage Lane - Site Ref SR-0158A

I am responding to Epping Forest District Council's (EFDC) request for any supplementary representations about the finalised version of the Site Selection Report and Appendices for the Epping Forest District Local Plan (DLP) dated March 2018.

In particular, we note the invitation relates to Appendices B and C to the Site Selection Report.

Strutt & Parker are acting on behalf of Countryside Properties in respect of their land interests in relation to the above site, which has been identified for allocation in the DLP as P6 North Weald Bassett. SR0158A is shown in the DLP as NWB.R3, proposed for approximately 728 homes. As such, it forms the substantial part of P6.

These supplementary representations should be read in conjunction with the representations made on behalf of our clients in January 2018 in response to the Regulation 19 Consultation.

We note that representations being sought are in response to criticisms that information on site selection was not made available as part of the Regulation 19 Consultation in order to deal with the legal position of the DLP as it proceeds forward for Examination. As far as site SR0158A is concerned, my clients are satisfied that the information provided has essentially been undertaken previously and in various documents to support the DLP. These include the Strategic Housing Land Availability Assessment, Site Selection Report 2016 as well as the North Weald Bassett Masterplanning Study prepared by Allies Morrison which all formed part of the evidence base at the Regulation 19 Consultation.

Against this background, whilst we understand the reasons for EFDC undertaking this exercise, there is no information within the Site Selection Report and Appendices that should deflect the Council from the identification of P6 and NWB.R3 as a proposed residential site for the District LP. Appendix B1.6.6 clearly sets out the reasons why this site has been chosen for allocation and we continue to support EFDC in this regard. The site is identified as being suitable, available and achievable to help meet the District's housing needs. However, we note that the allocation justification refers to the site being marketed. This is not understood and appears to have no particular relevance to the allocation justification. We would suggest that this is omitted.



We would draw attention to the following factual errors or suggested amendments in the site suitability, deliverability and capacity assessments.

Site Suitability Assessment

- The number of dwellings is expressed at 600 although the site capacity suggests 775. NWB.R3 indicates approximately 728 homes. We would suggest there should be greater consistency across capacity estimations to reflect policy P6. We are confident that the site will be able to deliver the proposed allocation proposed in the DLP.
- 4.2 – It is suggested that development of the site would involve the loss of best and most versatile agricultural land. My clients supplied an n agricultural land assessment to EFDC in July last year. That confirmed that the land value is, in reality, Grade 3. It is therefore of a lesser value than Grade 1 or 2 land .Reference could be made to the Council's need for housing across the District area which would inevitably result in some loss of land within Grade 1 to 3 throughout the District.
- 4.3 – Reference is made to a small part of the site containing public open space. This is incorrect. No part of the site involves the loss of public open space. We agree on the scoring that development will provide an opportunity to improve links to adjacent public open space.
- 5.2 – It is suggested that in the assessment reference could be made to the need for landscaping to provide for mitigation to assist settlement character.
- 6.1 – It is not clear as to why topographical constraints exist on the site. If that were the case as also indicated there is considerable potential for mitigation and. As indicated above we are very confident that we can deliver the development proposed for NWB3 in the DLP.
- 6.5 – Contamination constraints. The site has been used for arable food production for many years which is a clear indication that there is no contamination constraint present to development.

Availability and Achievability Assessment

- 1.1 - Ownership – The site is not in single ownership. Countryside Properties have agreed with three parties to bring forward the development of the site.
- 1.4 - Site availability – This refers to the site to be available between 2016 and 2020; should this be updated to reflect the DLP timeline and trajectory?
- 2.4b – Primary Schools – The site is adjacent to the St Andrews Primary School.
- 2.7 – The site is located within 1km of The Limes Doctors Surgery.
- 3.3 – We would suggest that the impact on Secondary Schools is overstated. It is our understanding that there may be potential to accommodate growth by expanding schools. This should be further clarified.

In conclusion, the information contained within Appendix B of the Site Selection Report confirms that site SR0158A is suitable, available and achievable for residential development and that it represents not only a suitable but also a sustainable site for new homes to justify its allocation as part of P6 of the District Local Plan.

I trust the above is helpful but should you have any queries, please do not hesitate to contact me.

Yours sincerely,



Dip Tp MRTPI
Senior Associate Director