

20th April 2018

Our Ref: CMH/UNC077 207242 Reps to Site Selection Work

Epping Forest District Council
Planning Policy Team
Neighbourhoods Directorate
Civic Offices
323, High Street
Epping
Essex
CM16 4BZ



Dear Sirs

RE: SUPPLEMENTARY REPRESENTATIONS RELATING TO THE SITE SELECTION REPORT APPENDICES B AND C, DATED MARCH 2018

SWORDERS ON BEHALF OF MRS BRIDGET UNCLE (LANDOWNER OF SITES SHR.R1 AND SHR.R3)

This representation relates to the Epping Forest District Local Plan Submission Version (LPSV) and is made on behalf of the owner of allocated sites SHR.R1 and SHR.R3, proposed for allocation for residential development of 10 and 12 dwellings respectively. We welcome the publication of the appendices to the 2017 Site Selection Report and the opportunity to comment upon them. The following comments supplement our regulation 20 representations.

Firstly, the information contained within these technical appendices fully justifies the allocation of sites SHR.R1 and SHR.R3, demonstrating that they are suitable, available and deliverable with no identified constraints that would prevent them from coming forward for development.

SHR.R1

Our regulation 20 representations made objections to the reduction of the size of the site. The larger site would contribute flexibility to the Plan and no evidence was provided at the regulation 19 stage as to the reasoning behind the reduction of the extent of the site, contrary to the requirement to base the plan on robust evidence (paragraph 158 and 182).

The recently published appendices set out that the site was reduced in size because, *"It was considered that the irregular configuration of the site proposed for allocation in the Draft Local Plan (2016) may impact upon its deliverability thus, it is proposed that development is limited to the southern portion of the site. This area is proposed for allocation."*

However, no reasons are provided as to why the shape of the site could affect deliverability. In fact, Appendix B1.4.2, which contains site suitability assessments, raises no comment or concern regarding the configuration of the site. Similarly, the delivery and capacity assessment at appendix B1.6.4 provides no justification as to why the site has been reduced in size, merely stating that, *"Development should be limited to the southern part of the site."*

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It is the case that adequate access can be achieved between both parts of the site to adoptable highways standards. Notwithstanding this, the Council is aware from information submitted on behalf of the landowner at previous stages of the Local Plan process (2008 Call for Sites, 2012 Community Choices Consultation, 2016 Site Survey) that the land to the north and east is in the ownership of the same landowner. Whilst we do not consider additional land is required to ensure delivery, if the Council have concerns to the contrary, the site boundaries have some flexibility.

Given the above, the- publication of the appendices do not ameliorate our soundness concerns on the issue of the extent of site SHR.R1.

Inaccuracies

There are some minor inaccuracies within the published appendices:-

- Appendix B1.4.2 – SHR.R1/SR-0033. Under 5.1, landscape sensitivity, the assessment indicates that the site is within an area of medium landscape sensitivity. In fact, the site is not situated within a landscape area considered by the Settlement Edge Landscape Sensitivity Study (SELSS). The site adjoins area 4, which is situated to the north, but area 4 does not include the site. As such, whilst the area does not currently fall within the development limits for the village, in landscape sensitivity terms the SELSS considers it should do. As such, the site should not be recorded as being within an area of medium sensitivity, because it is not, but rather than the SELSS considers the site to be within the built-up area of the village.
- Appendix B1.4.2 – 3.2 - distance to bus stops are given as more than 1000 metres. Route 59 runs through Sheering between Harlow and Chelmsford runs hourly 7am to 8pm Monday to Friday and similar hours on Saturday. This is supplemented by further services to Harlow on route 347. Stops for these buses are directly adjacent to SHR.R1 (SR-0033) and within 400 metres of SHR.R3 (SR-0311)
- Appendix B 1.4.2 – 3.7 - distance to nearest GP surgery is indicated to be more than 4,000 metres. The catchment GP surgery for Sheering is Hatfield Heath, which is between 1,000 and 4,000 metres distant.
- Appendix B1.6.4 – SHR.R1/SR-0033 is indicated to be more than 600 metres from publicly accessible open space. The site is situated adjacent to the recreation ground and access could be provided directly to it from the site.

Yours faithfully



Clare Hutchinson MRICS

Partner

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