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FMM Consultation 2022
Planning Policy, Epping Forest District Council
323 High Street, Epping
Essex, CM16 4BZ

29th November 2022

Dear Sir / Madam,

**Re: Epping Forest Local Plan Examination
Further Main Modifications Consultation
Representations by St Congar on behalf of St Congar Provincial**

These representations have been prepared by St Congar on behalf of St Congar Provincial, being submitted ahead of the consultation deadline of 5pm on Friday 9th December 2022.

St Congar Provincial control an omission site known as land at Old Farm, Chigwell (the site), which has been promoted for housing. See attached Phasing Plan which shows the extent of the site and three potential phases for housing.

Our responses to the relevant further main modifications (MMs) are set out below.

MM15

St Congar Provincial supports the removal of the sequential approach to allocations as it isn't necessary or compliant with the strategy of the Local Plan and the objective to bolster housing supply within the National Planning Policy Framework (NPPF).

MM100

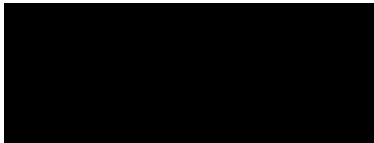
We support the deletion of rural sites that were proposed for allocation. The Inspector is correct that there are no exceptional circumstances for removing proposed site RUR.R1 from the Green Belt. Therefore, it will remain washed over by the Green Belt which makes its allocation for residential development unsound. The allocation must therefore be deleted.

MM111/112

We support the changes to the Local Plan Review mechanism in general terms. The proposal reflects comments that St Congar Provincial has made in previous rounds of consultation. Our firm position is that an early review should be committed to within the plan, given that this Local Plan seeks to deliver significantly below the current standard methodology target for housing delivery in Epping Forest. The Review of policies should be carried out soon after the adoption of the plan and initial evidence gathering should be twinned track to support the early stages of early Local Plan Review consultation.

St Congar Provincial looks forward to the opportunity to put forward Land at Old Farm as a perfectly suitable allocation to accommodate new homes within an accessible location that would represent a highly sustainable form of development.

Yours sincerely,



Ralph Salmon MRTPI

Director

St Congar



Encl – Phasing Plan