

17th April 2018

Our Ref: RB/ELD2211 218018 004 17 04 18



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 THE LANDOWNER OF SITE NWB.R1 AND NWB.T1 MR M ELDRED)

This representation relates to the Epping Forest District Local Plan Submission Version (LPSV) and is made on behalf of the landowners of site NWB.R1 and NWB.T1, proposed for allocation for residential development of approximately 223 dwellings and up to 5 pitches for traveller accommodation. 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 19 representations.

Firstly, the information contained in these technical appendices fully justifies the allocation of site NWB.R1 and demonstrates that is suitable, available and deliverable with no identified constraints that would prevent it coming forward for development.

NWB.R1:

Our regulation 19 representations made objections to the reduction in the size of the site on the basis that it was not underpinned by robust evidence as required by the NPPF (paragraphs 158 and 182), that the resultant Green Belt boundary is not defensible which does not comply with the NPPF (paragraphs 83 and 85) and that the failure to maximise the site area reduces flexibility of the LPSV.

The publication of the evidence base demonstrates that the reason for the reduction was due to the overall reduction in overall growth in the settlement. However, it does not address our concerns regarding the Green Belt boundary and flexibility of the LPSV.

Appendix B1.6.6 states that the omitted part of the site to the north of the A414 was considered to be in a more outlying location detached from the existing settlement and consequently less critical to the delivery of development in the settlement. However, we disagree with this view.



This part of the site is not outlying; it is in between the northern part of North Weald which is inset from the Green Belt and the proposed allocation. As set out in our regulation 19 representations, omission of this site will leave an illogical strip of Green Belt which will make little or no contribution to the purposes of including land in the Green Belt, in between the two built up areas of North Weald.

Appendix B1.6.6 also refers to the reduction in growth at the settlement; however, no evidence is presented as to why the omission of this site and the approximately 65 dwellings it would accommodate would be the most appropriate strategy to address the concerns expressed at regulation 18 stage.

Our view remains that the allocation should include the northern parcel in order to provide a logical Green Belt boundary and add built in flexibility to the Plan in the face of significant upward housing pressure.

In summary, we support the conclusions of the technical assessments of site NWB.R1 which demonstrate that it is suitable, available and deliverable for the proposed development. However, we consider that the evidence base underpinning the reduction in the size of the site is not robust as required by the NPPF (paragraphs 158 and 182).

NWB.T1:

Our regulation 19 representations made objections to the absence of evidence to justify the location of this site. Whilst the publication of appendices E1.6 and E1.8.2 clarify the specific size and location of the site, the appendices do not demonstrate that this site is the most appropriate location for this use or provide justification for the selection of this site and omission of others. It is not even clear whether other potential locations within the North Weald Basset or North Weald Airfield Masterplanning areas have been considered at all.

Appendix E1.1 (Overview of Assessment of Traveller Sites), simply refers to Appendix E1.8.3 as providing the justification for allocation of this, and all, sites proposed for allocation. It contains explanations for sites which are not proposed for allocation but no analysis is provided as to why the allocated sites were selected in preference.

Appendix E1.8.3 simply sets out that the site is available, has no identified constraints and is within the Masterplan area. No justification is provided as to why this site is considered suitable.

There appears to be no assessment of other possible locations within the North Weald Bassett or North Weald Airfield Masterplanning Areas, other than some very limited areas adjacent to roads. Specifically, no locations within land owned by the Council at North Weald Airfield have been considered, presumably due to the exclusion in the methodology of sites adjacent to airfield runways on the basis of noise and air quality concerns. Given the control that the Council has over the land at North Weald Airfield it seems illogical not to consider this as a potential location, particularly where the impacts of noise and air quality are unknown and potentially equal to those relating to the A414 (where locations have not been excluded).

The appendices that assess the site for suitability provide inconclusive and incomplete evidence regarding its suitability.



The Appendix D Methodology states that locating new traveller sites in immediate or very close proximity to existing developments in settlements is less likely to promote peaceful and integrated co-existence between the traveller and settled communities. As set out in our regulation 19 representations, the Council's own evidence base indicates a strong preference for sites to have a degree of separation from settled communities.

Therefore, Appendix E1.3 shows that all locations which are already developed and outside the Green Belt were discounted at stage 1. Whilst not currently adjacent to residential development, the site sits within the residential allocation so would ultimately be surrounded by residential properties on three sides.

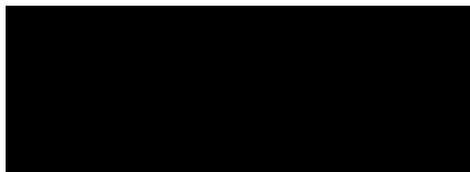
Appendix E1.6 states that access to the site would be gained via upgrades to the existing access from the A414. This appears to contradict the advice received from the Council regarding access for NWB.R1 that access should be gained from Blackhorse Lane.

If access from the A414 is considered appropriate for site NWB.T1 then it follows that it should also be appropriate for site NWB.R1.

If access from the A414 is not considered appropriate for site NWB.T1, then this site is unsuitable according to the methodology as it exceeds the maximum distance from a road. The Appendix D Methodology and Appendix E1.3 consider a location further than 100 metres from the edge of classified and other metalled roads to be a major policy constraint so all sites further than this distance were discounted. This site is over 100 metres from Blackhorse Lane.

In summary, we consider that the evidence base underpinning the proposed allocation of the site for this use is not robust as required by the NPPF (paragraphs 158 and 182).

Yours faithfully



Rachel Bryan MRICS

Partner

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