

17th April 2018

Our Ref: RB/KER410 217037 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 LANDOWNERS OF SITE ONG.R1 (EALES-WHITE, JOHNSON, KERR, KERR, AND MCKINNEY)**

This representation relates to the Epping Forest District Local Plan Submission Version (LPSV) and is made on behalf of the landowners of site ONG.R1, proposed for allocation for residential development of approximately 99 dwellings, in conjunction with site ONG.R2 for approximately 135 dwellings. 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 ONG.R1 and demonstrate that is suitable, available and deliverable with no identified constraints that would prevent it coming forward for development. The site is in a sustainable location with good access to services, development will not have an unacceptable impact on ecology or wildlife, any identified constraints can be mitigated and the site can be accessed via the existing access from the A414, with potential for further points of access from the A414.

Whilst loss of Green Belt and change to landscape character would occur, the Local Plan evidence base clearly demonstrates that development in this location would be the least harmful option for Ongar with all other development parcels considered around Ongar resulting in equal or greater harm to the Green Belt. As set out in our regulation 19 representations, the Site-Specific Requirements in Appendix 6 of the LPSV provide adequate mitigation.

Our regulation 19 representations raised objections to the limitation to a single point of access for both site ONG.R1 and adjacent site ONG.R2 on the basis that it is not underpinned by robust evidence, is not justified and is unnecessary. The publication of this evidence supports this view; the Site Suitability Assessment is clear that the site can be accessed via the existing access from the A414, with potential for further points of access from the A414.

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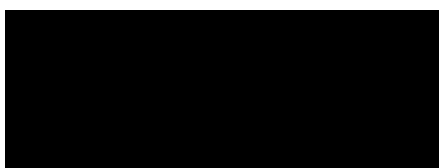




Whilst Appendix B1.6.6 suggests that access *may* need to be provided through the adjacent site, there is no justification in the evidence base for the single access point requirement and as such, this provision in Appendix 6 does not comply with the NPPF (paragraph 182).

In conclusion, the technical assessments of site ONG.R1 demonstrate that it is suitable, available and deliverable for the proposed development.

Yours faithfully



Rachel Bryan MRICS

Partner

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