Stakeholder Reference: Document Reference:

Part A

Making representation as Resident or Member of the General Public

Personal Details		Agent's Details (if applicable)
Title First Name Last Name Job Title (where relevant) Organisation (where relevant) Address	Mr Neil Moonie	,,
Post Code Telephone Number		
E-mail Address		

Part B

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph: 5.126

Policy: DM 4 Green Belt

Policies Map:

Site Reference: ROYD.R2 Settlement: Roydon

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: Don't Know

Sound: No

If no, then which of the soundness test(s) does it fail? Positively

prepared, Justified, Consistent with national policy

Complies with the duty to co-operate? Yes

Please give details either of why you consider the Submission Version of the Local Plan is not legally compliant, is unsound or fails to comply with the duty to co-operate; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible. Please use this box to set out your comments.

The Green Belt assessment prepared by LUC identifies this area (064.4) as making a strong contribution to one or more Green Belt purposes with a summary of the risk of harm as being high. The removal of ROYD.R2 from protection is inconsistent with past Council decisions (EPF/0137/07). The refusal to permit even limited development has contributed to Kingsmead House (last used briefly as a school) being left empty for much of the last decade.

I believe that Kingsmead House represents a heritage site which should be preserved. Sections 5.126 and 5.127 together with the details in appendix 6 provide no rationale for a radical change of policy; there are inadequate provisions for the preservation of the character of the site and few provisions to minimise harm to the remaining green belt other than the preservation of existing trees. The saturation housing implied and the possible demolition of Kingsmead House will result in unnecessary harm to the local environment as identified by EFDC consultants. Whilst detached houses may generate maximum profit, such development may not provide the most effective contribution to housing need. The lack of detailed information makes it difficult to assess whether or not proposals for ROYD.R2 are consistent with National Policy.

Please set out what change(s) you consider necessary to make the Pre Submission Local Plan legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I argue that the preservation of Kingsmead House should be included in any Development Requirements for this site to accord with policy DM 7.8.

I believe that a saturated development of 21 detached or semi-detached residences on this site will result in unnecessary harm to the broad area. Since 2007 I have understood that some relaxation of green belt provision would be needed to make conversion of the house economically viable. I would suggest that new homes on this site should take the form of apartments involving extension of the existing house or at least designed in sympathy with the central building. Such development might minimise the ground area lost from the green environment. Stronger provisions should be made with respect to landscaping the site. There should be detailed requirements for screening of car parking facilities and new landscaping and planting should be required at all boundaries.

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination

No

Signature: Neil Moonie Date: 24/01/2018

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