



Epping Forest
District Council

www.eppingforestdc.gov.uk



Representation form for Submission Version of the Epping Forest District Local Plan 2011-2033 (Regulation 19 publication)

This form should be used to make representations on the Submission Version of the Epping Forest District Local Plan which has been published. Please complete and return by 29 January 2018 at 5pm. An electronic version of the form is available at <http://www.efdclocalplan.org/>

Please refer to the guidance notes available before completing this form.

Please return any representations to: Planning Policy, Epping Forest District Council, Civic Offices, 323 High Street, Epping, Essex, CM16 4BZ

Or email them to: LDFconsult@eppingforestdc.gov.uk

BY 5pm on 29 January 2018

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Please attach any documents you wish to submit with your representation

Part A

1. Are you making this representation as? (Please tick as appropriate)

a) Resident or Member of the General Public ☐ or

b) Statutory Consultee, Local Authority or Town and Parish Council ☐ or

c) Landowner ☒ or

d) Agent ☐

Other organisation (please specify)

2. Personal Details

3. Agent's Details (if applicable) N/A

Title	Ms	
First Name	CHANTAL	
Last Name	MOORHOUSE	
Job Title (where relevant)	-	
Organisation (where relevant)	-	
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
E-mail Address		

Part B – If necessary please complete a separate Part B form for each representation

4. To which part of the Submission Version of the Local Plan does this representation relate?
(Please specify where appropriate)

Paragraph Policy Policies Map
Page 164

Site Reference Settlement

5. Do you consider this part of the Submission Version of the Local Plan:
*Please refer to the Guidance notes for an explanation of terms

- a) Is Legally compliant Yes ☒ No ☐
- b) Sound Yes ☒ No ☐

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

Positively prepared ☐ Effective ☐

Justified ☐ Consistent with national policy ☐

- c) Complies with the duty to co-operate Yes ☒ No ☐

6. Please give details 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. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments

PLEASE REFER. TO ATTACHED SHEET. '6.1'

SHEET 6.1

Representation Form B

Part B, 6

Land at Two Acres, Tysea Hill, Stapleford Abbots

Objections to the Submission Version of the Local Plan

1. I have read the submission version of the Local Plan in detail and do not accept that the proposed plan answers the objections to the Draft Local Plan (Appendix A attached) answers the objections and proposed amendments that I submitted.
2. With regard to the proposals for Stapleford Abbots set out in the submission version of the local plan I welcome the acknowledgement by the authority that additional housing is required in Stapleford Abbots. Also that there should not be a hard fixed Green Belt boundary around Stapleford Abbots.
3. My objections to the Draft Local Plan (Appendix A) have not been answered. Therefore in addition to Appendix A, I wish the following objections to be registered:-
 - i) Policy P12 on Page 164 allocating site STAP.R1, MAP 5.24 clearly indicates that the Green Belt boundary around Stapleford Abbots is not a hard line and can be subject to change.
 - ii) Notwithstanding this, my original objection remains as the revised Green Belt boundary around Stapleford Abbots is drawn both illogically tight to the rear of existing properties and therefore hard to defend and should be amended to the line shown on Plan 'A' (attached);
 - iii) If site STAP.R1 is acceptable for residential development then the two acre Tysea Hill site I previously proposed for housing is also acceptable and on a number of points scores higher than STAP.R1.
 - iv) Unlike STAP.R1, the Tysea Hill site is too small for viable economic agricultural use;
 - v) STAP.R1 has apart from the road boundary no strong physical or visual boundaries, unlike the Tysea Hill site which has a road and lane on two sides, existing housing on a third and strong existing copse of trees to the north;
 - vi) STAP.R1 will have a significant visual impact on the Green Belt due to its open nature and a visual impact on the Eastern entrance to Stapleford Abbots.

7. Please set out what change(s) you consider necessary to make the Submission Version of the 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 Submission Version of 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.

Please refer to sheet attached 'Sheet 7'

(Continue on a separate sheet if necessary)

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

if required and assist in understanding our representation

☐ No, I do not wish to participate at the hearings

☐ Yes, I wish to participate at the hearings

SHEET 7

Due to our objections set out in Section 6.1 and our previously addressed concerns which have not been addressed we ask that all these be reviewed fairly. As indicated in the submission version of the Local plan then Tysea Hill site, which is visually enclosed and having minimal impact on the green belt is also acceptable and should be allocated for residential development in the approved version of the Local Plan.

9. If you wish to participate at the hearings, please outline why you consider this to be necessary:

As noted under '8'

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

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

☒ Yes

☐ No

11. Have you attached any documents with this representation?

☒ Yes

☐ No

Signature:



Date:

28/1/18

APPENDIX 'A'

Comments relating to the Green Belt Policy in the Epping Forest District Local Plan-Draft Plan Consultation 2016

1. The September 2015 Green Belt Study identified Stapleford Abbots as "small village where the Green Belt Review should be undertaken as part of the Local Plan Review.
2. I acknowledge that the Stage 2 Green Belt Review looked at the broad purpose of The Green Belt around Stapleford Abbots. I believe a more detailed study of The Green Belt Boundary around the village should have formed part of the Stage 2 Review for the following reason:
3. The Green Belt Boundary has been drawn tight to the rear of the existing properties. This is both illogical and hard to defend as the line runs through gardens which would have been there when the original Green Belt Boundary was drawn.
4. I attach a plan 'A', which I accept is not a detailed study but shows how a robust physical defensible boundary to The Green Belt could be created.
5. It would also give a degree of flexibility in future identification of possible housing sites.

Comments Relating to the Identification of Sites to be Released for Residential Development

6. Two Acres, Tysea Hill, Stapleford Abbots: [REDACTED]
[REDACTED] vacant with no constraints and therefore available for development (confirmed in the SLAA Report.)
7. I would like to make the following comments on the SLAA Report:
 - a) The site is 0.71 hectares in area, of which approximately one third is covered by trees and hedges. Therefore the open land would be too small to use for viable economic agricultural use. This is the reason the site has remained fallow for so many years.
 - b) It is incorrect to say that the site is "covered by non-designated trees which may be lost if developed." The trees are on the northern third of the site. A low density development on the rest of the site would retain the trees and "act as a transition to the countryside." (see 7g below)
 - c) The strong line of trees/hedging along the northern boundary would also be retained in a low density development. The existing lane along this boundary would be a stronger physical Green Belt Boundary than the existing Green Belt Boundary. Stage 3a Assessment accepts that should the trees not be lost, there are no constraints to development which could be overcome and the site should continue to be considered. (Stage 3a Assessment)
 - d) There is inconsistency in the assessment of the site's Green Belt purpose. Stage 2 Assessment states "site is within The Green Belt where the level of harm caused by release

of the land for development would be high or very high. It should therefore not proceed further than Stage 3a."

e) The Site Suitability Assessment however, states that "the site falls within an area of low landscape sensitivity –characteristics of the landscape are able to accommodate development without significant character change." (para 5.1)

f) The Green Belt Review Stage 2 also concludes that Stapleford Abbots makes "no strong contribution to any Green Belt purpose." And also, gardens to existing houses in the village "cause no harm"- (being in the Green Belt).

g) Regarding Kensington Park: The report comments "large houses set in large gardens act as a transition to the countryside."

h) The Site SR-0873 identified as suitable for housing development in The Draft Local Plan is assessed in the ARUP Site Suitability Assessment as:

i) Site is within the Green belt –where the level of harm caused by release for development would be high or very high (same as SR-0243)

ii) Development would involve the loss of the best and most versatile agricultural land (Grade 1-3) See Para 4.2. (This assessment is the same as for Site SR-0243)

iii) It would seem therefore that the rejection of site SR-0243 applies equally to SR-0243 and so SR-0243 should not have been excluded from proceeding from Stage 3a of The Assessment findings.

Conclusion

For all the above reasons I suggest that The Draft Local Plan should be amended to cover the following:

- 1, The Green Belt Boundary around Stapleford Abbots should be re-assessed.
- 2) Site SR-0243 should be identified as a low density housing site subject to the retention of the existing trees and hedgerow.

PPING FOREST DISTRICT

LOCAL PLAN

ADOPTED JANUARY 1998

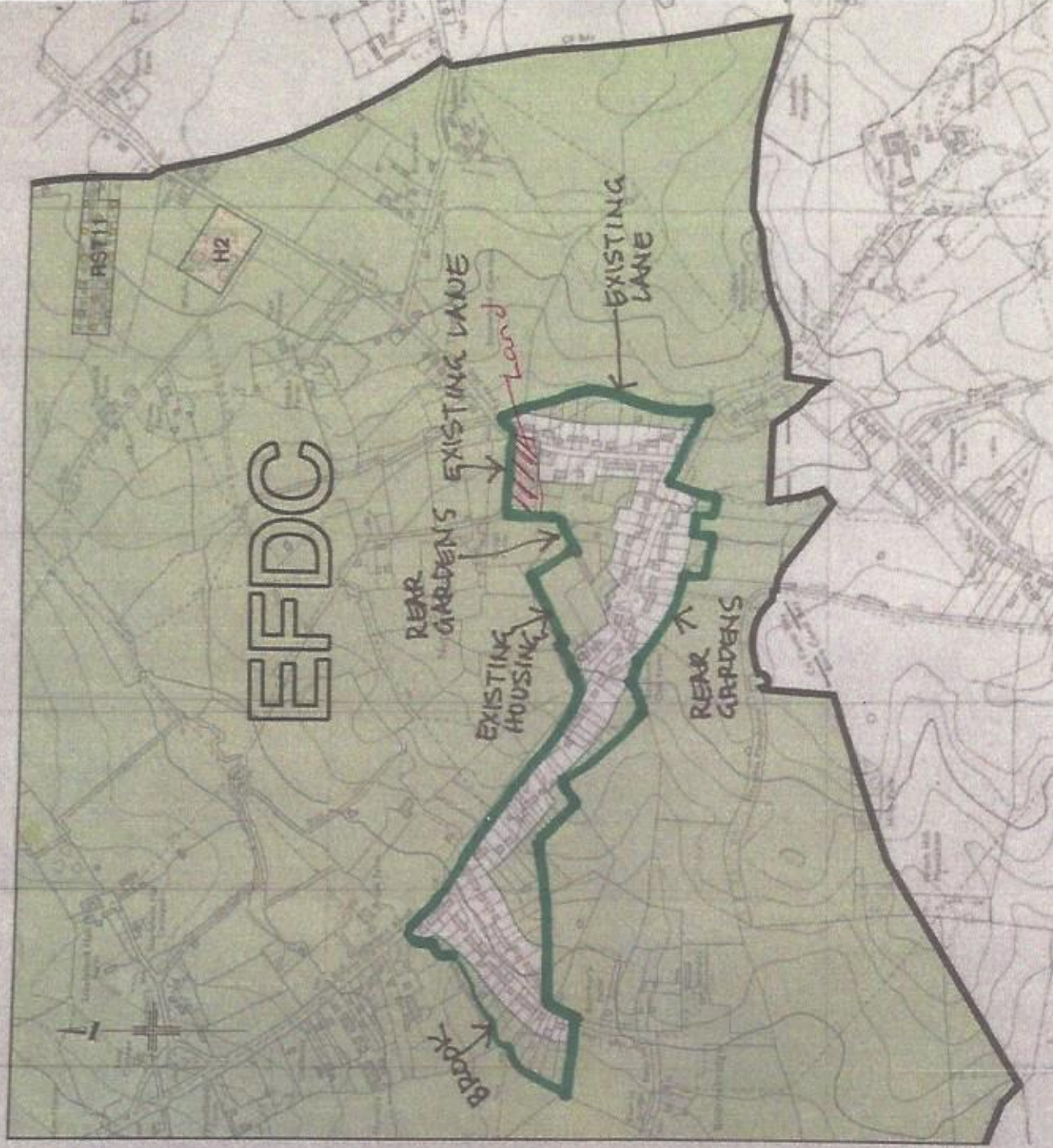
Sheet 'E'

1:10,000

Stapleford Abbotts

Inset Map 14

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PLAN A