

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)	
Title	<input type="text" value="Mr"/>	<input type="text" value="Miss"/>	
First Name	<input type="text" value="Robert"/>	<input type="text" value="Emma"/>	
Last Name	<input type="text" value="Pilcher"/>	<input type="text" value="Penson"/>	
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Associate"/>	
Organisation (where relevant)	<input type="text"/>	<input type="text" value="DWD Property + Planning"/>	
Address Line 1	<input type="text" value="c/o Agent"/>	<input type="text" value="6 New Bridge Street"/>	
Line 2	<input type="text"/>	<input type="text" value="London"/>	
Line 3	<input type="text"/>	<input type="text"/>	
Line 4	<input type="text"/>	<input type="text"/>	
Post Code	<input type="text"/>	<input type="text" value="EC4V 6AB"/>	
Telephone Number	<input type="text" value="c/o Agent"/>	<input type="text" value="02073322115"/>	
E-mail Address	<input type="text" value="c/o Agent"/>	<input type="text" value="emma.penson@dwdlip.com"/>	

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

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

See separate sheet.

(Continue on a separate sheet if necessary)

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.

See separate sheet.

(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?

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

☒ **Yes**, I wish to participate at the hearings

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

Wish to be given the opportunity to participate at the hearing to further explain why further consideration should be given to the allocation of land to the south of Middle Street.

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:

DWD Property + Planning

Date:

29/01/2018

Question 6

The number of units allocated for development in Nazeing has reduced from the previous version of the Draft Local Plan (October 2016) by approximately 100 units, from 220 to 122 units. The Council has not provided sufficient justification to verify this substantial reduction at such a late stage in the preparation of the plan. Reduced housing numbers could result in an under provision of housing in Nazeing or less suitable sites coming forward for development.

The Draft Local Plan (October 2016) proposed to allocate SR0300a (29 homes) and SR 0300b (21 homes). Earlier versions of the plan also proposed to include a wider parcel of land which also included further land adjacent to these parcels, as shown on Map 1 below. The wider site comprises of land bordered by Middle Street to the North, Perry Hill to the east and south and Old House Lane to the west. This includes land owned by Robert Pilcher.

Three separate landowners own the land shown on Map 1. The landowners are Robert Pilcher, John and Linda Wilkinson and Joan Keeling. SR0300a is owned by John and Linda Wilkinson. SR0300b is owned by Joan Keeling. Map 2 shows the land owned by Robert Pilcher.



Map 1 Google Maps 2018. Approximate Only. Not to Scale – Land previously considered for allocation as part of SR 0300



Map 2 Google Maps 2018. Approximate Only. Not to Scale – Land owned by Robert Pilcher.

Robert Pilcher's land has been put forward to the Council as a site to be considered for development since Summer 2015. Robert Pilcher is **supportive of the total site** shown at Map 1 coming forward for **residential development**. Development of the total site offers the opportunity to provide a substantial element of **affordable housing**. **Developing only part of this land is not supported.**

The total land parcel shown at Map 1 should be considered further by the Council as it offers the opportunity to deliver further housing in Nazeing in a sustainable location.

There is existing development on the north side of Middle Street and therefore bringing forward further development to the south of Middle Street would provide a natural and logical extension to Nazeing. The Council's limited reasoning for removing these parcels from the allocation is unsustainable and to ensure the plan is sound the land should be assessed further as it is considered to offer a sustainable location for housing to support housing delivering in Nazeing and within Epping Forest.

It is understood that English Heritage has raised concern regarding the impact of development on both Ninnings and Shadwalkers, which are existing listed houses located on the south side of Middle Street. Further consideration should be given to the opportunities to provide development in this part of Nazeing whilst preserving the Listed Buildings. The land shown at Map 1 that was previously considered by the Council for development is of a sufficient size and has a topography that will allow development to come forward that is sympathetic to the Listed Buildings. Further consideration must be given to this by the Local Authority. Both the owners of the Listed Buildings are also supportive of development coming forward on the land surrounding the Listed Buildings.

Question 7

To ensure that the plan is sound, positively prepared and justified the Council should further assess the housing need and number of housing units that can sustainably be provided in Nazeing to support housing delivery in Epping Forest.

The Council should further consider **allocating the total site bordered by Middle Street to the North, Perry Hill to the east and south and Old House Lane to the west**. The whole site should be allocated, not part of this land. The total site offers the opportunity to bring forward residential development with a substantial element of affordable housing.

The Council should further assess the opportunities to bring forward development to the south of Middle Street that is sympathetic to the Listed Buildings. The Listed Buildings should not be considered to be a constraint that prevents the development of this land.