

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="Messrs"/> | <input type="text" value="Mr"/> | |
| First Name | <input type="text" value="John & Roger"/> | <input type="text" value="Paul"/> | |
| Last Name | <input type="text" value="Pryor"/> | <input type="text" value="Atton"/> | |
| Job Title (where relevant) | <input type="text"/> | <input type="text" value="Associate Director"/> | |
| Organisation (where relevant) | <input type="text" value="C J Pryor Ltd"/> | <input type="text" value="JB Planning Associates"/> | |
| Address Line 1 | <input type="text"/> | <input type="text" value="Chells Manor"/> | |
| Line 2 | <input type="text"/> | <input type="text" value="Chells Lane"/> | |
| Line 3 | <input type="text"/> | <input type="text" value="Stevenage"/> | |
| Line 4 | <input type="text"/> | <input type="text" value="Herts"/> | |
| Post Code | <input type="text"/> | <input type="text" value="SG2 7AA"/> | |
| Telephone Number | <input type="text"/> | <input type="text" value=""/> | |
| E-mail Address | <input type="text"/> | <input type="text" value=""/> | |

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

Please see paragraphs 2 - 10 of enclosed representation.

(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.

Please see paragraphs 2 - 10 of enclosed representation.

(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:

In order to enable the content of our written representations to be fully investigated through an oral examination.

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:

29.1.18

Introduction

1. These representations are made on behalf of C J Pryor Ltd, who are the landowners of Cecil House, Foster Street, Harlow, Essex CM17 9HY. These representations relate to the Regulation 19 Consultation on the Epping Forest District Draft Local Plan 2011-2033.

Cecil House, Foster Street, Harlow

2. Land and buildings at Cecil House, Foster Street, Harlow comprise a 2.7 ha brownfield site in the Green Belt, where at present there are a number of long established buildings in use for employment as a substantial contractor's depot with yard areas, including open storage (please see the site plan within Appendix 1).
3. We confirm therefore that land on the western half of this site is 'previously developed land' and in this case, paragraph 89 of the NPPF (2012) sixth bullet points applies with regard to potential development. Paragraph 89 allows for **"limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development"**.
4. Land on the eastern side of the C J Pryor site comprises paddock land enclosed by hedging and fencing.
5. C J Pryor Ltd object to Policy P13 – 'Rural Sites in the East of the District' in that as part of the land is brownfield land, it should therefore have been allocated for residential development within the terms of the sequential approach to allocations set out in Policy SP2 – Spatial Development Strategy 2011 – 2033.
6. We are aware, that Epping Forest District Council cannot demonstrate a five year housing land supply. We understand that the Council experience significant issues with housing delivery, primarily due to the constraints imposed by the Green Belt. Policy SP2 sets out the requirement for the Council to deliver a minimum of 11,400 new homes allocated in accordance with a sequential

approach and within this approach is criterion (v) “previously development land within the Green Belt”. Sites such as this should be allocated in advance of land either in green field/Green Belt land on the edge of settlements (criterion vi) and agricultural land (criterion vii). It therefore follows that the C J Pryor Ltd Cecil House site with its extensive yards and buildings should logically have been allocated for residential development ahead of other sites within the district which involve Green Belt land releases.

7. On this basis, the District Council's proposed development strategy is unsound as it has allocated Green Belt land for residential development ahead of Brownfield sites within the Green Belt and is inconsistent with national planning policy.
8. Looking in further detail at Foster Street, we have noted that within the plan, the Council have allocated rural sites RUR.E7 – Land at Searles Farm and RUR.E8 – Fosters Croft, Foster Street. In Appendix 1, we have provided a site plan and aerial photograph showing the Cecil House site in relation to RUR.E7 and RUR.E8 for context.
9. It also follows that the grassed paddock land between the Cecil House yard and RUR.E8 should also be included for development by rounding off the potential housing allocation and making a more logical area for development. Given the overwhelming housing need for both private and affordable housing and the lack of impact on the Green Belt with this parcel of land being located between two developed sites.
10. We propose, that the Cecil House yard and depot site should be allocated in the plan for housing given that large areas of it are previously developed land. We understand that Epping Forest District Council has previously endorsed development of the western ‘brownfield’ part of the site for residential redevelopment. However, this has not been recognised in the emerging Local Plan. As such, C J Pryor Ltd object to its non-inclusion.



Epping Forest District Local Plan 2011 – 2033 (Regulation 19 Consultation)

Representations on behalf of C J Pryor Ltd

Summary and Proposed Policy Amendments

11. We propose the following amendments:
 1. **Policy P13 be amended by the addition of a new residential allocation:**

B (iii) RUR.R3 – Cecil House. Foster Street, Harlow – approximately 65 dwellings.
 2. **Policies Map 5.25 be amended accordingly.**
12. We would like to appear at the Examination in Public to explain the above objections when it convenes later in 2018.

PA/1498/sf
29 January 2018

