Stakeholder Reference: Document Reference:

Part A

## Making representation as Resident or Member of the General Public

Personal Details	3	Agent's Details (if applicable)
Title	Mr	
First Name	Frank	
Last Name	Russell	
Job Title (where relevant)		
Organisation (where		
relevant)		
Address		
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: Appendix 6 STAP.R1 Policy: P 12 Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sheering and Stapleford Abbotts Policies Map: Yes Site Reference: None of the above Settlement: Stapleford Abbots

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

Legally compliant: No Sound: No If no, then which of the soundness test(s) does it fail? Consistent with national policy Complies with the duty to co-operate? No 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.

No consultation with relevant stakeholders, that is, those villagers directly impacted by the development proposed for the land in Oak Hill Road known as STAP.R1. The original local plan specifically excluded development of this land it was deemed as it was not considered suitable as "the council does not consider there are distinct special options for locating residential development within Stapleford Abbotts" I therefore contend that the consultation in its final draft is null and void as I did not object to the original version, as STAP.R1 was not included. It should be removed from the final submission.

Additionally, i do not believe the council has carried out "sustainable appraisal" in that the 4 aspects of consideration for development in a green belt area have not been met.

• Under the 1st green belt purpose, the proposed development creates unrestricted sprawl of

large built up areas. In line with the rating for parcel 033.1(Kensington Park) this would at least score 3/5.

• Under the 2nd green belt purpose preventing neighbouring towns from merging into one another, we would argue that this would score 5/5 as it would join the villages of Stapleford Abbotts and Havering Atte Bower.

• Under the 3rd green belt principle assist in safeguarding the countryside from encroachment; in-line with parcel 033.1, (Kensington Park) we consider the propose site to score 5/5.

• Under the 4th green belt principle to preserve the special character of historic towns, it is harder to comment as we have no local benchmark. This is however a large visible area with many houses overlooking historical views which would be removed by this development.

Under this principle I would consider this to score highly.

Finally on the third criteria for legal policy compliance Identifying and resolving significant cross- boundary issues, and demonstrating the Council has met its Duty to Cooperate: The proposed site sits on the borders of Epping Forest district council and London Borough of Havering. Access points would cause congestion on the only single lane road joining these and stakeholders have not been consulted about this. Increasing the size of the road is not an option as it would affect the historical nature of the villages. We cannot see how access and egress can be safely managed in the Stapleford Abbotts nor the Havering section of the plot, due to the sharp blind bend on the border of the two villages. For all of the above I vehemently oppose the development of a housing estate in Stapleford Abbotts. Other areas for consideration:

• Flood issues from building on land near to a brook.

• Main drains which currently cannot manage with the existing residential capacity.

• Village school can not accommodate more pupils currently with half in portacabin accommodation.

• Concerns with increased issues with power when the village has regular power cuts.

• An already dangerous junction at Tysea Hill with impaired vision.

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.

There aren't any changes that i could recommend to make this a sound and legal proposition because of the arguments I present above.

# 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 oral 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

Yes

Signature: F. Russell Date: 28/01/2018

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