

Epping Forest District Council Representations to the Draft Local Plan Consultation 2016 (Regulation 18)

Stakeholder ID	3392	Name	Michael	Gallimore on behalf of Peer Group and Bovis Homes	on behalf of Peer Group PLC and Bovis Homes PLC in relation to land at the Ongar Park Estate
Method	Letter				
Date	19/1/2017				

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Letter or Email Response:

Dear Sirs EPPING FOREST DRAFT LOCAL PLAN CONSULTATION 2016 ONGAR PARK ESTATE - NORTH WEALD BASSETT REGULATION 18 RESPONSE ON BEHALF OF PEER GROUP PLC AND BOVIS HOMES PLC We act for the Peer Group PLC and Bovis Homes PLC in relation to the promotion through the Epping Forest Draft Local Plan (the "Local Plan") of land which forms part of the Peer Group's Ongar Park Estate ("OPE") at North Weald Bassett. The site comprises 15ha (38 acres) to the southeast of North Weald Bassett. We enclose Peer Group's and Bovis Homes' representations in response to the Regulation 18 consultation. The representations comprise this letter and the 10 documents listed in the contents page, which address the range of issues which are relevant to the promotion of the site. The OPE has not been identified by the Council as a proposed allocation for housing in the Local Plan. However, as the representations make clear, due to a misunderstanding between the land owner and the Council as to the extent of land and the scale of development being promoted for site allocation, we consider that significant errors have been made in the Council's assessment of OPE. As a result it is clear that the Council's evidence base and its site allocations in North Weald Bassett will need to be reconsidered in order to ensure a sound Local Plan process. The errors are set out in the representations, but in summary they comprise; 1. The extent/area of land being promoted for development; 2. The scale of development being proposed; 3. Misinterpretation of the consultation feedback received by the Council, to the North Weald Masterplanning Study (Allies and Morrison September 2014); 4. Failure by the Council to follow its own sequential strategy for site allocations as contained in the draft Local Plan (paragraph 3.54); As a result of the above, the Council has misdirected itself in respect of: • The Settlement Pattern; • The Green Belt; • Agricultural Land; • Landscape; • BAP Priority Species or Habitats; and • The setting of the Ongar Park Redoubt. It is also important to note that OPE is in single ownership and thus is deliverable to meet the strong need for residential development. The site can be brought forward immediately and comprehensively to produce a sustainable and well planned form of development. Further, the representations provide evidence that the Local Plan does not clearly identify what the Council believes to be its Objectively Assessed Housing Need ("OAN"). We consider that the Local Plan falls substantially short of its obligations to assess and meet the OAN in full as required by paragraphs 14 and 47 of

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the NPPF. This reflects another important flaw in the Local Plan process. Following the Regulation 18 consultation the Council will have an obligation to re-consider its approach to the Local Plan and the sites to be allocated for residential development, taking full account of these representations and the shortcomings in the Local Plan process which we have identified. Only by adopting that approach of re-consideration will the Council have a prospect of the Local Plan being found sound. We consider that this re-consideration should properly result in OPE being allocated for development on the basis of the very clear planning merits and benefits identified in these representations. The misunderstanding between our client and the Council regarding the extent of land and the scale of development being promoted for site allocation has clearly had a very material impact on the Local Plan preparation and process. It is important that the errors to which this has led are addressed as a result of this Regulation 18 consultation to produce a Local Plan which is sound. Our client and its professional team are ready and willing to work constructively with the Council in respect of the draft Local Plan and, in particular, the allocation of our client's land for housing in North Weald Bassett. Please acknowledge safe receipt of this letter and the enclosed representations. Yours faithfully Hogan Lovells International LLP Encs ATTACHED:2. Regulation 18 Submission.pdf 3. Site Plans and Location Plan.pdf 4. Sustainability Report .pdf 5. Landscape Sensitivity and Capacity Study.pdf 6a. Green Belt Assessment - Review.pdf 6b. Green Belt Assessment - Appendices A and B.pdf 6c. Green Belt Assessment - Appendices C and D.pdf 7a. Environmental Issues Assessment.pdf 7b. Environmental Issues Assessment - Appendix A (1).pdf 7c. Environmental Issues Assessment - Appendix A (2).pdf 7d. Environmental Issues Assessment - Appendix A (3).pdf 7e. Environmental Issues Assessment - Appendix B-C-D.pdf

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