

Written response to Government Inspector from Jeremy Roos. Dated 23.04.19.

(Deadline 24.04.19)

Matter 15 P4 Ongar

*Issue 1: Have the Plan's housing allocations been chosen on the basis of a **robust** assessment process?*

Issue 2; How were the conclusions reached about individual sites checked for accuracy and consistency? Were sites visited or were they assessed through a desktop process? What has been done to check the assessments in specific cases where their accuracy has been challenged e.g. Site SR-0596? (Reps 19LAD0012).

Response

This issue goes right to the heart of the matter as far as I am concerned. Whilst I concede to that there had to be a favouring the developer in the initial early stages of 'Epping Plan' preparation, there still must be 'Fair Play'. SR 081 which later became H.Ong 1 is a perfect example of Epping Forest District Council, favouring the needs of the individual developer with wanton disregard of its own assessment criteria (Appendix A Stage 2 + 6.1 Criteria).

In my 19-page Section 18 response, I submitted a correct score chart (as below) clearly identifying major mistakes made by ARUP in its assessment to this site. As demonstrated in this table, Arup SSA scores identified were plainly **wrong** and will not stand up to scrutiny. If Arup were to have applied the same rigor as afforded to the other five sites in High Ongar (which has resulted in all the other five sites being dismissed from the Draft Plan) then this site should have been ruled out at this early stage.

For example, Appendix A Stage 2 + 6.1 Criteria, astonishingly makes no reference to LUC Green Belt review Stage 2 Aug 2016. LUC visited and assessed each site from a Green Belt view for EFDC, but rather than use this important direct evidence chose to rely on its own flawed 'Desk Top' analysis to make an assessment on Green Belt values which might explain one reference to H.Ong 1 as a Brownfield site with no value to the Green Belt. LUC scored the potential level of harm to the Green Belt as very High. Arup failed to mention other obvious problem issues with this site that it had no access what so ever and missed an obvious large ancient tree sitting in the middle of the field. A reliance on a quick glance at an out of date google earth picture, no doubt the cause of these two errors. Other errors of an exaggerated size of plot, complicated ownership issues were also ignored,

My Section 18 response corrected factual inaccuracies but was essentially ignored, as was my Section 19 response. Quite clearly ARUP have compounded their initial desktop assessment errors by simply ignoring their own rules of engagement to try and rubber stamp this through.

Factual inaccuracies to which the EFDC relied on to make its assessment is one thing, but just to ignore the correction is a blatant, arrogant and wanton disregard for correct procedures it is surely bound by? This therefore MUST call into question the robustness of the assessment process!

The chart below shows the Arup SSA scores for all the sites in High Ongar with totals at the bottom of each column. The last figures column shows the corrected scores for SR-0181 and demonstrates how clearly the low score takes SR-0181 out of consideration in comparison like for like scores with the other High Ongar sites.

	SR-0054i	SR-0054ii	SR-0054iii	SR-0393	SR-0458	SR-0181	SR-0181 Re-score	
1.1	0	0	0	0	0	0	0	
1.2	0	0	0	0	0	0	0	
1.3a	0	0	0	0	0	-2	-2	
1.3b	0	0	0	0	0	0	-1	Ancient Tree
1.4	0	0	0	0	0	0	0	
1.5	0	0	0	0	0	0	0	
1.6	2	0	0	0	0	0	0	
1.7	2	-1	-1	-1	2	2	0	
1.8a	-2	0	0	1	1	1	0	close to heritage site
1.8b	-1	-1	-1	-1	-1	-1	-1	
1.9	-1	-1	0	0	-1	0	0	
2.1	-2	-1	-2	-2	-1	0	-2	Level of harm to Green Belt
3.1	-1	-1	-1	-1	-1	-1	-1	
3.2	1	1	0	0	1	0	0	
3.3	1	1	1	1	1	1	1	
3.4	1	1	1	1	1	1	1	
3.5	1	1	1	1	1	1	0	Distance to Primary school
3.6	-1	-1	-1	-1	-1	-1	-1	
3.7	0	0	0	0	0	0	0	
3.8	n.a	n.a	n.a	n.a	n.a	n.a	n.a	
4.1	-1	-1	-1	-1	-1	-1	-1	
4.2	-2	-2	-2	-2	-2	-2	-2	
4.3	0	0	0	0	0	0	-1	
5.1	-2	0	-2	-1	0	0	-1	Landscape sensitivity
5.2	0	-1	-1	-1	-1	0	-1	
6.1	0	-1	-1	-1	-1	-1	-1	
6.2a	0	0	0	0	0	0	0	
6.2b	0	0	0	0	0	0	0	
6.3	-1	0	0	0	0	-1	-1	
6.4	1	1	1	-1	-1	1	-1	Access to site
6.5	0	0	0	-1	0	-1	-1	
<u>6.6</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	
Total	-5	-6	-9	-10	-4	-4	-16	

There should have been a re-scoring of Arup's SSA regarding SR-0181. The new score as detailed above would have easily taken it out of the recommendations to build.

Conclusion.

Inspector, I would urge you to conclude that in its current form, the submitted Epping Plan is not legally compliant or sound for these reasons I have submitted to you.

I would now respectfully submit that you have ample evidence to recommend that H.Ong 1 site be included in one of your 'Main Modifications' and must be excluded completely from the plan to be adopted because of the serious flaws in the way H.Ong 1 was included in the submitted plan.

If this is never going to happen, I strongly would urge you 'right a wrong' and persuade the council to make 'minor alterations' to the Plan before it is adopted (which do not materially affect its policies or concern soundness).

My "Additional Modification" would be that the original suggested change to the Green Belt boundary be restored to include the whole of my property in order that I am not prejudiced completely in favour of the property developer. Having half my property in and half out of the Green Belt as proposed at the moment is highly unsatisfactory. This would be a rounding of a natural enforceable boundary to the Green Belt and easily available for you to recommend.

I hope this report is helpful and look forward to speaking to you in May.

Respectfully Submitted,

Jeremy Roos