



**Epping Forest
District Council**
www.eppingforestdc.gov.uk



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)

December 2017

3. 2. Personal Details		3. Agent's Details (if applicable)	
Title	Mr		Mrs
First Name	A		L
Last Name	Norris		Cook
Job Title (where relevant)			
Organisation (where relevant)			Smart Planning
Address Line 1	C/o Smart Planning		Old School House
Line 2			Rettendon Turnpike
Line 3			Battlesbirdge
Line 4			
Post Code			SS11 7QL
Telephone Number			0330 053 6811
E-mail Address			developmentplans@smartplanning.co.uk

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 refer to Smart Planning's justification enclosed with this form.

(Continue on a separate sheet if necessary)

Question 6 - Soundness & Justified

We strongly agree that the plan has been positively prepared and will provide the necessary housing in the right locations in particular the proposed Garden Town Community which is planned as part of the Latton Priory Masterplan Area and proposed to deliver approximately 1,050 homes, 1ha of employment land and 0.5ha for up to 5 traveller pitches. The proposed masterplan area sufficiently takes into account the needs of both Harlow and Epping and demonstrates how housing can be achieved in a new community and represents a clear vision for the area. The need for additional housing within this area will not diminish over time.

Our client owns a site at the Former Debbies Garden Centre, Riddings Lane, Harlow, CM18 7HT which is currently used as a hard landscaping contractor's yard on an unrestricted basis. Despite being in the Green Belt, the site is clearly a brownfield site, adjacent to the existing built-up area of Latton Bush, Harlow and is a prime opportunity for redevelopment. We are pleased to see that this area is incorporated within the Latton Priory Masterplan Area and to provide some of the much needed housing this area and the country as a whole so desperately needs. The plan is justified in that it provides an appropriate and logical strategy to develop adjacent to an existing settlement and to form an urban extension.

The Latton Priory Masterplan Area is in an appropriate area, on the edge of an existing settlement boundary with good access to local services and infrastructure nearby. Whilst the loss of the Green Belt is regrettable, the need for expanding housing provision locally is key and Garden Towns such as this have been encouraged by the Government and provide a major opportunity to provide new homes and will represent an effective re-use of our client's brownfield site.

Whilst we fully support the proposed plan, it is disappointing that it was given no weight by the Council's Development Management Department during submission of our recent planning application for 50 new houses on the site which was refused on the basis of the principal of development, despite the local plan being within the latter stages of preparation (LPA ref. number EPF/1831/17). Officers gave the plan no weight or consideration which is extremely frustrating despite the desperate need for housing and the fact that this is a brownfield site. Our client has written to the Rt Hon Sajid Javid MP for his support in respect of this proposal.

It is considered that the Latton Priory Masterplan Area will represent sustainable development by ensuring that Early Years facilities, a new two-form primary school and appropriate contributions towards a secondary school are secured, as highlighted in paragraph 2.125 of the plan. These facilities will be essential to ensure there is no burden on existing infrastructure/services and to provide an attractive and sustainable community within Latton Priory, in accordance with the National Planning Policy Framework (NPPF).

Paragraph 154 of the National Planning Policy Framework (NPPF) states; *"Local Plans should be aspirational but realistic... Local Plans should set out the opportunities for development..."* and paragraph 157 goes on to add, *"Crucially, Local Plans should... allocate sites to promote development and flexible use of land, bringing forward new land where necessary..."* The proposed policies referenced above are consistent with national policy and the aims of the NPPF.

It is considered that the provision of housing on our particular site is deliverable and is available for redevelopment at the earliest opportunity, thus can be used as a catalyst to regenerate the remainder of the site and to promote new housing in this area. We are keen to see this area developed at the earliest opportunity. Therefore, the aims of this section of the plan are considered to be deliverable and achievable and we fully support the strategy that the Council have recommended and have put forward.

The plan demonstrates a duty to cooperate and joined up thinking to address the housing needs of both Epping and Harlow.

Therefore, to summarise we fully support the policies set out above and the Draft Local Plan proposals map. The plan has been positively prepared, is justified, effective and consistent with national policy. We trust that the Inspector will take these points into account and fully support the soundness of the Submission Version of the Epping Forest District Local Plan.

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.

N/a - No revisions or amendments required.

(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:

N/a

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: 25/01/2018