

**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.**

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**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](mailto:LDFconsult@eppingforestdc.gov.uk)

**BY 5pm on 29 January 2018**

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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***

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**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 of Town and Parish Council  or

c) Landowner  or

d) Agent

Other Organisation (please specify)

**2. Personal Details****3. Agents Details (if applicable)**

Title

Mr

Mrs

First Name

Graeme

Clare

Last Name

Watt

Hutchinson

Job Title  
(where relevant)Organisation  
(where relevant)

Sworders

Address Line 1

C/O Sworders

The Gatehouse, Hadham Hall

Line 2

Little Hadham

Line 3

Ware

Line 4

Herts

Post Code

SG11 2EB

Telephone  
Number

01279 771188

E-mail Address

clare.hutchinson@sworders.com

**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**

**We have the following soundness concerns with policy SP6:**

- The policy fails to have regard to the requirement in paragraphs 83 and 85 of the NPPF to ensure green belt boundaries are capable of enduring beyond the plan period and will not require alteration at the end of the development plan period.

Paragraph 83 of the NPPF requires that at the time Green Belt boundaries are reviewed regard should be had to their permanence in the long term, so that they should be capable of enduring beyond the plan period. Paragraph 85 bullet 5 requires that when defining boundaries, Local

Authorities should be satisfied that Green Belt boundaries will not need to be altered at the end of the development plan period.

The full OAN for the district amounts to 12,573 dwellings. Housing supply of 13,152 dwellings is identified, i.e. an additional 579 dwellings are allocated over OAN. Paragraphs 2.76 and 2.77 of the draft Plan outline that this contingency allows for flexibility and acknowledges that recent household projections demonstrate an upward trend in housing need. The draft Plan does not state that the proposed contingency relates to the requirements of paragraphs 83 and 85 of the NPPF.

Paragraph 3.97 of the 2016 regulation 18 draft Plan acknowledged that it would be necessary to, *"...identify land to be safeguarded to meet future development needs"* and outlined that the extent of safeguarded land as required under NPPF paragraph 85 was, at that time, still being considered.

As such, despite this acknowledgement in the 2016 draft Plan that safeguarded land would be required to satisfy the requirements of the NPPF, the final submission draft Plan fails to provide this safeguarded land. This is contrary to the requirements of National Policy.

*(continue on a separate sheet if necessary)*

7. Please set out what changes(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.

The general extent of Green Belt as set out at map 2.5 should be amended to include additional allocations, in order to be consistent with national policy (NPPF paragraphs 83 and 85)

*(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:

This representation raises issues which would be most appropriately discussed at the oral hearing and cannot be dealt with satisfactorily through written representations alone.

*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:

26 January 2018