



## 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 or Town and Parish Council  or

c) Landowner  or

d) Agent

~~Other organisation (please specify)~~

On behalf of Croudace Homes

**2. Personal Details****3. Agent's Details (if applicable)**

Title	Mr	Mr
First Name	Richard	Julian
Last Name	Kelly	Black
Job Title (where relevant)	Strategic Land Promoter	
Organisation (where relevant)	Croudace Homes	Kember Loudon Wilams
Address Line 1	The Spirella Building	Ridgers Barn
Line 2	Bridge Road	Bunny Lane
Line 3	Letchworth Garden City	Eridge, Nr Tunbridge Wells
Line 4	Herts	Kent
Post Code	SG6 4ET	TN3 9HA
Telephone Number	01462 413480	01892 750018
E-mail Address		julian.black@kw.co.uk

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**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

Appendix B – "Assessment of Residential Sites", of the 2017 Report on Site Selection (ARUP) is absent from this crucial evidence document. Therefore it was not complete at the time the Sustainability Appraisal was completed or when Councillors voted to authorise the consultation of the Submission Version document. As the Council have decided not to release all of its evidence to support its site selection process, the Submission Version of the Local Plan is not legally compliant. This approach breaches the Statement Of Community Involvement - which amongst other things, requires all supporting documents to be made available (in offices and website) for inspection for those interested parties wishing to respond to the statutory consultation.

In addition the Local Plan Submission Version is considered unsound on the basis that it is not justified or consistent with national policy. In view of the above, it stands to reason that the Plans underlying strategy cannot be justified if the proportionate evidence to support it is not available. Moreover, the plan is contrary to Part 6, para 47 of the NPPF which states: "Local Authorities should use their evidence base to ensure that the Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period".

Finally Part 2 of para 46 of the NPPF refers to the annual identification and update of a supply of specific deliverable sites, which the site selection evidence document relates to. Without this information it is impossible to draw firm conclusions.

(Continue on a separate sheet if necessary)

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.

Publish outstanding information and extend consultation period to address this error

*(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

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Signature:



Date:

26.01.18

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