

Stakeholder Reference:

Document Reference:

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## Part A

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### Making representation as Secretary on behalf of the Lea Valley Growers' Association

Personal Details		Agent's Details (if applicable)
Title	Mr	
First Name	Lee	
Last Name	Stiles	
Job Title (where relevant)	Secretary	
Organisation (where relevant)	Lea Valley Growers' Association	
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**Part B**

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**REPRESENTATION**

**To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?**

Paragraph: Policy E 3 Food production and glasshouses

Policy: None of the above

Policies Map: Yes

Site Reference: None of the above

Settlement: Lea Valley

**Do you consider this part of the Pre Submission Local Plan to be:**

Legally compliant: No

Sound: No

If no, then which of the soundness test(s) does it fail? Positively prepared,Effective,Justified,Consistent with national policy

Complies with the duty to co-operate? No

**Please give details either 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; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible. Please use this box to set out your comments.**

The Lea Valley Growers' Association on behalf of members take this opportunity to register their deep disappointment with the draft local plan and believe it does not meet the tests of soundness as set out within paragraph 182 of NPPF for the following reasons.

The Associations objection to the local plan is of national significance when considering the Lea Valley as one of the largest food producing Glasshouse areas in the UK.

There exists a conflict with national policies and in particular in this case protection of food production.

Although the Lea Valley Glasshouse industry predominately falls within the boundary of Epping Forest District Council, the Business owners and a large proportion of their workforce reside just one mile away in the neighbouring authority of Broxbourne in Hertfordshire.

This presents a significant effect beyond the immediate locality and epitomises a cross boundary controversy, demonstrable of how the council have failed to consider the long term impacts on economic growth across a wider area than a single local authority.

Therefore we believe that the plan has not been prepared in accordance with the Duty to Co-operate under section 33A of the 2004 Act.

Previous submissions to the EFDC Local Plan consultation by the LVGA are dated 17th September 2012 & 12th December 2016.

Draft Policy E 3 Food production and glasshouses in its current form will disadvantage growers in the Lea Valley over their competitors from other locations who are not subject to specific Glasshouse development policies which go above the NPPF.

In view of this members are unable to understand the council's vacuous statement of support for the industry.

Members have concerns with the integrity and credibility of the Lea Valley Regional Park Authority and Epping Forest District Council co funded "One Epping Forest" and it's Food Task Force who the council refer to within One Epping Forest 3.28.

It is incomprehensible how the Lea Valley Food Task Force will create a production base by 2035 that exceeds 2014 levels of production by a minimum of 20% in any event, however, it is simply ridiculous to suggest this if growers are placed at a disadvantage to competitors when proposed planning policy reduces investment confidence and growers ability to secure finance.

This statement is simply without substance.

The Association has had no involvement with the Food Task Force for several years following the removal of their representative by the chairman without explanation.

The only grower who retained involvement will be land locked by housing proposals within the draft local plan.

The Association also has no involvement with the Epping Forest District Council part funded "One Epping Forest" Food Task force or the council part funded "London Stansted Cambridge Consortium" and considers their AgriFood sector priority as meaningless.

Members have concerns regarding the purported engagement with the Lea Valley Growers Association as stated within Other Forms of Engagement 3.10 as the council have ignored all of the Associations submissions, suggestions and representations.

The council have failed to allow the Association to meet with or present its case to authority members and

**Please set out what change(s) you consider necessary to make the Pre Submission 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 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.**

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**If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

Yes, I wish to participate at the oral part of the oral examination

**If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

Member's regret that representations made by them and the Association within previous correspondence and numerous meetings with the Council have been ignored.

LVGA Members (as one of the largest employers in the district) feel they have received extremely poor treatment from the council during this process and will challenge the draft local plan as written, in order to protect growers and the continued uninterrupted supply of Healthy British Fresh Produce.

**Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination**

Yes

Signature: Lee Stiles Date: 16/01/2018