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Stakeholder Reference:

Document Reference:

Part A

Making representation as Statutory Consultee, Local Authority or Town and Parish Council

	Personal Details	Agent's Details (if applicable)
Title	Miss	
First Name	A	
Last Name	Pearson	
Job Title (where relevant)	Senior Planning Policy Officer	
Organisation (where relevant)	Brentwood Borough Council	
Address	Town Hall Ingrave Rd, Brentwood	, ,
Post Code		
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Part B

REPRESENTATION

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

Paragraph:

Policy: P 4 Ongar

Policies Map:

Site Reference: None of the above

Settlement: Ongar

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

Legally compliant: Yes

Sound: Yes

If no, then which of the soundness test(s) does it fail?

Complies with the duty to co-operate? Yes

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.

Epping Forest District Council and Brentwood Borough Council share a number of strategic planning matters that affect both our areas, such as housing and infrastructure. We note that development is planned for Ongar 9for 590 new homes) which is close to the Epping Forest and Brentwood administrative boundary. The additional homes in Ongar need to provide supporting local community infrastructure facilities to lessen any burden on nearby villages within the 'rural north' area of Brentwood Borough. Brentwood is in support of Epping Forest's Plan to meet their housing need over the plan period and are therefore in general support of the proposed development. Continued engagement will be required following the adoption of the Epping Forest Local Plan, particularly around infrastructure, schools, and GP surgeries in the Ongar area due to its close proximity to Brentwood Borough.

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.

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 oral examination

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

REPRESENTATION

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

Paragraph: 2.80

Policy: SP 2 Spatial Development Strategy 2011-2033

Policies Map:

Site Reference: None of the above

Settlement:

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

Legally compliant: Yes

Sound: Yes

If no, then which of the soundness test(s) does it fail?

Complies with the duty to co-operate? Yes

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.

Epping Forest shares a housing market area with three other districts - East Herts, Harlow, and Uttlesford. The four districts have finalised and signed a Memorandum of Understanding (MoU) regarding housing requirements, where the West Essex & East Herts housing market area authorities have committed to meeting their housing needs. Brentwood Borough supports this approach. However, we do note that Epping Forest District Council will not be meeting their five-year housing supply. The Epping Forest Plan states that "if the Authority Monitoring Report (AMR) demonstrates that annual housing delivery is less than 75% of the annualised requirement or the projected completion rate (whichever is lower) for three consecutive years, the Council will undertake a partial review of the Plan". In light of this sentence we raise concern as to whether Epping Forest District can actually meet their housing need as set out in the Plan and SHMA. Local plans are required to be reviewed every five years. Therefore, the above sentence would not be required unless there were concerns that the housing delivery targets could not be met.

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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REPRESENTATION

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

Paragraph: 2.47-2.51

Policy: SP 2 Spatial Development Strategy 2011-2033

Policies Map:

Site Reference: None of the above

Settlement:

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

Legally compliant: Yes

Sound: Yes

If no, then which of the soundness test(s) does it fail?

Complies with the duty to co-operate? Yes

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.

According to the Epping Forest Plan, the district will be providing 10,800 new jobs over the plan period (2011-2033). It goes on to further state that 7,900 new jobs will be provided between 2016-2033. However, it is not clear in the plan if the remaining 2,900 jobs have already been provided for between 2011-2016.

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.

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 oral examination

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

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

Yes

Signature: Brentwood Planning Policy Team Date: 25/01/2018

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Epping Forest District Council

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