



**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)

2. Personal Details		3. Agent's Details (if applicable)	
Title	Mr		Ms
First Name	Simon		Louise
Last Name	Fulbrook		Morton
Job Title (where relevant)			Director
Organisation (where relevant)			Quadrant Town Planning Ltd
Address Line 1	[REDACTED]		The Office
Line 2	[REDACTED]		14 Harcourt Close
Line 3	[REDACTED]		Henley on Thames
Line 4	[REDACTED]		OXON
Post Code	[REDACTED]		RG9 1UZ
Telephone Number	[REDACTED]		01491 571 123
E-mail Address	[REDACTED]		lm@quadranttownplanning.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 support the Epping Forest Local Plan Submission Version, specifically Policy SP2 which sets out the Spatial Development Strategy for the period 2011-2033. We note the housing allocation for Epping has been reduced from 1,640 dwellings contained in the draft Local Plan to 1,305 dwellings in the Submission Version. This is still a sizeable allocation for Epping which currently has some 5,300 dwellings. The allocation will result in a 25% increase in the size of the town. It is imperative therefore that this population increase is matched by appropriate infrastructure provision.

In accordance with the test of soundness set out in paragraph 182 of the NPPF, we have reviewed the body of evidence supporting the Local Plan, and are of the view that Policy SP2 adopts a pragmatic approach to the quantum and distribution of new residential development across the district.

We note that the Spatial Development Strategy is based on a sequential approach to the allocation of sites (as contained in paragraph 2.66) and the Submission Version has given due weight to some of the more sensitive Green Belt locations which were advanced in the previous Draft Local Plan and revised the distribution strategy to bring it more in line with Government policy. The core planning principles set out in paragraph 17 of the NPPF promote a brownfield first principle and, as far as possible, Policy SP2 adopts this with a distribution which seeks to minimise the impact of new development on the Green Belt.

(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.

Q 6 cont'd

Policy SP2 promotes the most appropriate housing strategy when considered against reasonable alternatives, given that some 95% of the District is allocated as Green Belt. We therefore consider the approach is justified.

The strategy should be effective as it takes in to account the role of smaller sites, as well as larger strategic sites, and this will assist in achieving a deliverable housing target over the plan period.

Policy SP2 reflects the duty to co-operate in allocating land within the District to meet the needs of Harlow. This is supported as it will lead to a sustainable pattern of development, which will benefit from the accessibility and infrastructure provision in Harlow.

(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:

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:

Louise Morton

Date:

26.1.18
