



## **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)

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

Title	<input type="text"/>	<input type="text" value="Ms"/>
First Name	<input type="text"/>	<input type="text" value="Charlotte"/>
Last Name	<input type="text"/>	<input type="text" value="Hutchison"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Senior Planning Consultant"/>
Organisation (where relevant)	<input type="text" value="PegasusLife"/>	<input type="text" value="Iceni Projects"/>
Address Line 1	<input type="text" value="c/o Agent"/>	<input type="text" value="Flitcroft House"/>
Line 2	<input type="text"/>	<input type="text" value="114-116 Charing Cross Road"/>
Line 3	<input type="text"/>	<input type="text" value="London"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="WC2H 0JR"/>
Telephone Number	<input type="text"/>	<input type="text" value="02036575036"/>
E-mail Address	<input type="text"/>	<input type="text" value="imcgeever@iceniprojects.com"/>

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**Part B – If necessary please complete a separate Part B form for each representation**

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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

*(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.

Please see attached representations.

PegasusLife do not consider the Council's approach to affordable housing provision in Policy H2 is justified. The development model which PegasusLife operates is intrinsically different to that of a normal housing scheme.

Fundamentally, although the individual units will be sold, a large proportion of the proposed built form will not be sold and will be managed as community facilities for the community benefit of the residents. The proposed scheme includes various communal facilities including restaurants, lounges, spa, swimming pool, and vast gardens. This results in a large amount of the built form being unprofitable, which reduces the revenue of the scheme compared to a general C3 scheme, and therefore reduces the capability to provide toward affordable housing provision.

Secondly, by subjecting lower value specialist housing developments to the same affordable policy as conventional C3 housing developments, the Council is preventing specialist housing groups from competing for development sites in the District, which will further exacerbate the very high levels of need for assisted living schemes in the District.

A full explanation is provided in the accompanying representations.

*(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 see enclosed representations letter.

*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:

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