

Stakeholder Reference:
Document Reference:

Part A

Making representation as Agent on behalf of Landowner or Land Promoter

	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	Michael	Ed
Last Name	Moult	Norris
Job Title (where relevant)		Senior Planner
Organisation (where relevant)Redacted.....	DLP Planning Ltd
AddressRedacted.....Redacted.....	4 Abbey Court, Fraser Road, Bedford MK44 3WH
Post CodeRedacted.....	MK44 3WH
Telephone NumberRedacted.....	01234 832740
E-mail AddressRedacted.....	ed.norris@dlpconsultants.co.uk

Part B

REPRESENTATION

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

Paragraph:

Policy: SP 2 Spatial Development Strategy 2011-2033

Policies Map:

Site Reference: None of the above

Settlement: Waltham Abbey

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

Legally compliant: Yes

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? Don't Know

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.

DLP has undertaken a significant reassessment of the housing requirements arising in the district - details of which are attached to other representations submitted on behalf of clients.

The revised OAN takes into consideration the DCLG 2014-based starting point and applying a 20% uplift to address worsening market signals. The proposed housing requirement of the Plan is significantly below this. There is no justification for proposing an OAN in the evidence base so significantly below the 2014-starting point. It is not at all clear how this will meet the Governments objective of addressing the housing crisis.

The delivery strategy is considered to be unsound as it is not considered likely that it will enable the Local Planning Authority to demonstrate a five year supply of land from the adoption of the Plan and for its lifetime.

Considering the housing need, and the vision of the Plan to increase the vitality and sustainability of Waltham Abbey, further allocations should be made. Paragraph 2.77 identifies that the supply of housing to 2033 exceeds the requirement. Rather than stating this, the plan should actually be preparing for a greater housing need, as identified in the housing need section of this representation. The use of a sequential approach for allocating homes has meant that many suitable, sustainable sites that have not registered as such on a tick box exercise have been missed out of further assessment and ultimate allocation, including the Objection Site.

For the reasons outlined above, DLP submit that Policy SP2 is not sound as it has not been positively prepared, is not justified and will not be effective. The EFLP should plan for a greater housing need and a larger amount of allocations, particularly around areas that are in need of regeneration such as Waltham Abbey and where there is demonstrable capacity to accommodate a higher level of growth.

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.

The OAN for Epping should be increased to at least 824 dwellings per annum.

Policy SP2 should be amended accordingly to increase the allocation of housing at Paternoster Hill, Waltham Abbey to at least 1120 dwellings to include land owned by The Farmers Club Charitable Trust - see attached documents.

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:

We have undertaken our own significant assessment of OAN and matters pertaining to the requirement for and delivery of homes which underpins our objection. We believe that the process of the Inquiry may be assisted by our participation in this fundamental consideration in order that differences between our clients and the Council can be addressed in full and therefore a robust conclusion reached as to the soundness of the Plan

REPRESENTATION

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

Paragraph:

Policy: SP 5 Garden Town Communities

Policies Map: No

Site Reference: None of the above

Settlement: Waltham Abbey

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

Legally compliant: Yes

Sound: No

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

Complies with the duty to co-operate? Don't Know

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.

It is noted in Policy SP5 that the EFLP is seeking to rely on three large scale strategic allocations. The three allocations detailed in Policy SP5 total nearly 4000 dwellings and are all located in relation to Harlow. All will require amendment to existing Green Belt boundaries.

It is considered that the Local Plan should send a more positive signal about the importance of housing delivery and also seek to ensure that the importance of development to the north of Waltham Abbey is recognised. The allocation of sites to the north of Waltham Abbey including the Objection site should be reflected as a strategic allocation within Policy SP5 as the only sustainable, location for further housing growth within the town, with the fewest constraints and having regard to the importance of planned growth to meet the town's future needs.

For the reasons outlined above, Policy SP5 is not sound as it fails to ensure that sufficient weight is attached to the delivery of a range of development sites across the District which can ensure the continuity of land supply as well as meeting local development objectives and overall housing need. Accordingly the Policy, as drafted is not positively prepared or likely to be effective.

Documents to support this objection are submitted in connection with an objection to Policy SP2

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.

Sites should be allocated which are demonstrably able to be implemented and to deliver sufficient new homes especially in the early years of the Plan

Sites allocated to the north of Waltham Abbey should be recognised as forming a strategic allocation

An additional site comprising land north of Paternoster Hill should be added to the allocation of land at Waltham Abbey to expand the range of sites available, the capacity for development and to relieve infrastructure issues that are not accounted for in the Local Plan

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:

The delivery of land is of fundamental importance to the soundness of the Local Plan. We consider that our objection can make a material contribution to ensuring the soundness of the Local Plan and that we may better be able to assist the Inspector to direct on soundness by participation at an oral hearing.

REPRESENTATION

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

Paragraph:

Policy: P 3 Waltham Abbey

Policies Map: Yes

Site Reference: None of the above

Settlement: Waltham Abbey

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

Legally compliant: Yes

Sound: No

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

Complies with the duty to co-operate? Don't Know

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 scale and selection of sites for development at Waltham Abbey is not justified or effective having regard to the nature of the evidence base and the interpretation of it arrived at in allocating land.

Specifically, Policy P3(m) is unsound as it fails to include land at Paternoster Hill and Policy P3(f) is unsound as it makes no reference to the ability to secure such works as are recognised to be necessary to deliver the improvements identified at Policy P3(n)(vii). No provision is identified or made in the Infrastructure Delivery Plan for highway or other works necessary which are fundamental to the implementation of the proposed allocations to the north of the town.

Policy P3 is therefore unsound as it does not provide for sufficient development to meet the needs of the community or of the district as a whole and nor does it make sufficient provision to ensure that the development proposed can be implemented.

Further details are set out in documents submitted in connection with an Objection to Policy SP2.

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.

The chapter of the Local Plan concerning Waltham abbey should be revisited properly to address the needs of the town and moreover its capacity to accommodate planned sustainable growth.

Policy P3 should be extended to include the allocation of land at Paternoster Hill and such allocation should recognise the pivotal role that the Objection Site should play in delivering sustainable access to allow the implementation of other allocated sites WAL.R1, R2, R3, E6 and E2.

In this respect the allocation of sites to the north of Waltham Abbey including the Objection Site should be recognised as a strategic development allocation – see objections to Policy SP5.

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:

We believe that the changes requested to achieve soundness are fundamental to the deliverability of the Local Plan and so far as they concern land owned by the Objector, the Inspector may be assisted by participation in any oral hearing

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

Yes

Signature: Ed Norris Date: 29/01/2018