



**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 / Agent :

3. Agent's Details (if applicable)/on behalf of :

Title	Mr	Mr	Mr
First Name	Mike	David	Tom
Last Name	Newton	Lewis	Thornewill
Job Title (where relevant)			Hallam Land Management Ltd
Organisation (where relevant)	Boyer	CEG	
Address Line 1	Crowthorne House	Sloan Square House	10 Duncan Close
Line 2	Nine Mile Ride	1 Holbein Place	Moulton Park
Line 3	Wokingham	London	Northampton
Line 4	Berkshire		
Post Code	RG40 3GZ	SW1W 8NS	NN3 6WL
Telephone Number	01344 753 225		
E-mail Address	mikenewton@ boyerplanning.co.uk		

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

**Policy SP3

Site Reference Settlement *Please see attached sheet

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 *Please see attached sheet

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

Please see attached sheet.

(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 sheet.

(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:

In order to provide further information to assist the Inspector in assessing the soundness of the Plan and to inform a decision as to any necessary modifications to achieve this purpose.

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:



Date:



Policy SP3 – Place Shaping

- 1 We support the objectives of this policy and most of its requirements.
- 2 We also support the amendment made to this policy since the Regulation 18 consultation to acknowledge that the relevance of each place making principle to particular development sites will vary dependent on their scale. We consider however that this could be clarified further by amending the first paragraph of the Policy as follows (new text underlined):

H. Strategic Masterplans and development proposals must reflect and demonstrate that the following place shaping principles have been adhered to where applicable with respect to the scale of development proposed...

- 3 This point is important as it will not be possible for all smaller sites and allocations to meet the criteria set out. For example, the strategic allocations should lend themselves to providing a mix of land uses, but the smaller residential sites allocated in Chapter 5 may not be able to meet these criteria. For example, a small residential development site is unlikely to provide, “a robust range of employment opportunities with a variety of jobs within easy commuting distance of jobs”.
- 4 We would suggest that place shaping principles be devised, discussed and agreed with developers, specifically for the strategic sites, through the Developer Forum and masterplanning processes. These principles can then feed into the production of the Strategic Masterplans, where required under Policy SP4.
- 5 In this regard, we support the Council’s statement at paragraph 2.94 that the production of Strategic Masterplans “will ensure that development proposals are ‘front-loaded’ and where possible accelerated”.
- 6 Pursuant to this however, paragraph 2.98 also suggests that the Council will require Design Codes to be produced in accordance with the general principle established via Strategic Masterplans, *before* planning applications are submitted for individual sites. We question the need for a Design Code to be prepared before an application is submitted, unless a site does not come forward under a single outline application. Where that is the case however, a Design Code could be secured via condition and agreed prior to any application for reserved matters approval being submitted in order to accelerate the delivery of sites. It appears superfluous to require both a Strategic Masterplan and Design Code to be prepared, submitted and agreed in turn, before the Council will entertain a planning application, particularly where sites are in single ownership.
- 7 We also note that the timing referred to in paragraph 2.98 does not directly reflect Figure 2.1 (‘Planning process for Strategic Masterplans’), which shows the preparation of Design Codes as taking place simultaneously with an Outline Planning Application.