



**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.**

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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 / 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		

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**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 H1  
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 H1 – Housing Mix and Accommodation Types**

- 1 We generally support the principles of this policy and the fact that it provides important criteria to guide the consideration of such matters in development proposals, rather than prescriptive or inflexible specific requirements.
- 2 Part A(v) states that development will be permitted where the mix of new homes “provides for all new homes to be accessible and adaptable as defined by the Building Regulations in effect at the time of the application”.
- 3 This appears to be a reference to optional standard M4(2) of the Building Regulations which relates to accessibility, as this standard can only be used by a LPA where it has been adopted as a policy in the local plan. In order to adopt this standard however the Council must justify this as part of the Examination using the evidence requirements set out in the Planning Practice Guidance (PPG). For accessible and adaptable homes the LPA must show that there is a need for such homes and that the adoption of these targets will not, when considered alongside all other costs affecting development, make a scheme unviable.
- 4 The Council's justification for adopting this standard is set out in supporting paragraph 3.4, however this make no specific reference to viability and so this must be justified through the examination process. Without such justification there is a risk this element of Policy H1 could be considered unsound.
- 5 It would also be useful for Policy H1 to make specific reference to optional standard M4(2) of the Building Regulations in the interests of clarity and transparency.

