



**Epping Forest  
District Council**

www.eppingforestdc.gov.uk

epping forest district  
planning our future  
local plan

## 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 SP 6

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 SP 6 – Green Belt and District Open Land

- 1 Over 92% of Epping Forest is designated as Green Belt, and it has been a long held view of the Council that a review of the Green Belt boundary would be necessary in order to accommodate long term development needs.
- 2 We support the Council's policies and proposals with regard to the Green Belt and, in particular, the principle of altering the Green Belt boundary to allow the allocation of strategic sites around Harlow.
- 3 As stated in paragraph 2.135 of the Plan, the NPPF requires that exceptional circumstances are demonstrated to justify any alteration to the Green Belt boundary. It is important to recognise that the exceptional circumstances are most clearly evident and compelling where the level of need for development is acute.
- 4 We support the justification for altering the Green Belt boundaries as summarised in paragraph 2.136 of the Plan. We consider that the overall need for growth and regeneration at Harlow also constitutes exceptional circumstances that justify Green Belt alteration. The needs of Harlow are clearly set out in paragraph 2.140 of the Plan and we think it would be helpful to define these needs as exceptional circumstances.
- 5 Map 2.5 of the Plan illustrates the Green Belt Boundary Alterations, with the detailed boundaries and inset settlements defined in Chapter 5 of the Plan and shown on the policies map. For the reasons discussed in Section 5 in respect of Policy SP5, we consider that the Green Belt boundary adjoining Latton Priory should be moved further south, as the proposed Green Belt boundary does not align with 1) the boundary of the residential site allocation or 2) with a permanent recognisable boundary as required by paragraph 85 of the NPPF.
- 6 We question the appropriateness of developing on Green Open Spaces within existing settlements and note in particular the proposals in this respect for Loughton. The proposed Garden Town Communities at Harlow and Latton Priory in particular, provide opportunities to increase housing capacity overall within the District and remove the need for the development of green spaces in the Epping Forest main settlements.

