



**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 SP4

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

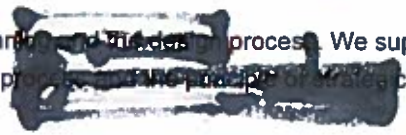
Signature:



Date:



POLICY SP4 – DEVELOPMENT AND DELIVERY OF GARDEN COMMUNITIES

- 1 **SP4(A)** allocates Latton Priory, the Water Lane Area and East of Harlow as new Garden Town Communities as part of the Harlow and Gilston Garden Town. We support the allocation of all three sites and their definition as Garden Town Communities although the capacity to support a higher level of provision, particularly at Latton Priory, should be considered.
- 2 **SP4(B)** relates to comprehensive planning and infrastructure planning. We support the principles of holistic and comprehensive planning in accordance with the Infrastructure Delivery Plan (IDP). As the IDP is a 'live' document that will be refined and updated during the life of the Plan it should not be a fixed policy requirement. The development of the package of infrastructure required to support the delivery of each Garden Town Community will be an iterative process, the detail of which will evolve over time in parallel with the masterplanning of the development.
- 3 **SP4(C)(i)** relates to public/private sector collaboration. We strongly support this principle and that of future stewardship, management, maintenance and renewal of community infrastructure and assets.
- 4 **SP4(C)(ii)** refers to the community engagement strategy. We strongly support this principle and the promoters are committed to the development of such a strategy as part of the emerging masterplan for Latton Priory.
- 5 **SP4(C)(iii)** refers to the inclusion of opportunities for community-led housing development. We support this in principle but if it is to be a policy requirement then what is meant by 'community-led housing development' needs to be clearly defined within the policy itself and appropriate evidence provided to justify this requirement.
- 6 **SP4(C)(iv)** refers to governance and stewardship. We support and commit to this principle but the policy wording would benefit from further clarification to understand what is anticipated in this regard. Whilst we are happy to engage with Officers in respect of matters of governance and stewardship we do not consider that this should be an obligation on developers to fund.
- 7 **SP4(C)(v) to SP4(C)(viii)** relate to strategic planning and the design process. We support the sequential approach to the planning and design process.  masterplans and design codes.
- 8 We note however that there appear to be many stages to the design process defined for the Garden Town Communities, beginning with the TCPA Garden City Principles and including the preparation of a 'Spatial Vision and Design Charter Framework' followed by the 'Design Charter' (paragraph 2.114 refers). This then informs the strategic masterplans and the preparation of design codes. In addition, the Council proposes to establish a Quality Review Panel which it proposes will be involved at various stages. It will be important to set a clear and efficient timescale to these processes so they assist rather than complicate delivery and each process must be pragmatic and viable. These stages should overlap rather than run sequentially over a long time span.

- 9 We are supportive of the TCPA Garden City principles. They offer a distillation of the key elements that have made the Garden City model of development so successful. As a set of high-level principles they are considered to offer sufficient flexibility to enable individual site circumstances, constraints and viability considerations to be taken into account.
- 10 As with Policy SP3, we support the principle of the preparation of strategic masterplans to be endorsed by the Council, and support the principle of compliance with the strategic masterplan when preparing and submitting planning applications at the Garden Town Communities.
- 11 We also support the preparation of design codes in principle. For the reasons discussed in response to Policy SP3 however, it is not considered necessary for design codes to be finalised prior to the determination of outline planning applications, particularly where sites come forward as a single application. Instead design codes can be introduced as an intermediate stage before submission of reserved matters, to be controlled by condition, to speed up delivery and reduce lead-in times.
- 12 We also support the intention to set up a Quality Review Panel provided its role, remit and powers are clearly defined. We hope that this will ensure that the review process is efficient and avoids potential conflicts and delays associated with considerably long and complex reviews of future masterplans.
- 13 SP4(C)(ix) relates to the timing and delivery of infrastructure. We support this principle and the acknowledgement of viability considerations as a determining factor in the timing of infrastructure provision.
- 14 SP4(C)(x) relates to balanced and inclusive communities, and also makes reference to provision for self- and custom-built homes. Whilst we are happy to incorporate an element of self and custom built homes at Latton Priory to support this aspiration we would recommend that this is limited to no more than 1% of the proposed development. In our experience self and custom build houses are unlikely to be taken up in significant numbers on large development sites as they are generally better suited to small scale bespoke sites.
- 15 Consideration should also be given to the fact that self builds will take significantly longer to deliver homes than homes built by national house builders. In addition they are also likely to cost more due to the plot sales being required to contribute towards infrastructure and individuals unlikely to be able to secure the economies of scale on construction costs achieved by national house builders.
- 16 SP4(C)(xi) relates to small-scale employment generating uses. We would query this reference and would like to understand more clearly how the Council has determined the scale of employment to be provided and whether strategic employment allocations are being regarded as a separate issue from the Garden Town Communities. We would assert that, given the size and scale of the Harlow and Gilston Garden Town, the promotion and allocation of large scale employment allocations is vital to delivering sustainable communities. We have considered this point further below in commenting on the Latton Priory allocation under Policy SP5.1.

- 17 **SP4(C)(xii)** seeks to create a modal shift in travel patterns. We are supportive of this aspiration and have previously highlighted through our representations the potential for Latton Priory to contribute towards the improvement of connections to the town centre, railway station and employment sites. Our masterplan for Latton Priory will incorporate a comprehensive network of walking and cycling routes which will provide high quality environments to encourage the safe movement of both pedestrians and cyclists. Furthermore, we also recognise that the site could play a significant role in the delivery of a north-south sustainable transport corridor which would assist in contributing towards this modal shift to sustainable modes of transport.
- 18 **SP4(C)(xiii)** relates to sustainable transport and partly appears to duplicate **SP4(C)(xii)** above. The concept of the Sustainable Transport Corridors is laudable but needs better definition in terms of scope, timing and funding before it can be firmly tied to the garden town proposals. Paragraph 2.117 refers to the preparation of a 'Sustainable Transport Corridor Study' which will presumably provide further clarification and we would request that this Study be discussed with developers through the Epping Forest District Developers Forum.
- 19 **SP4(C)(xiv) to SP4(C)(xv)** relate to community infrastructure, parking approaches and environmental/landscape character. We support these principles. We would also welcome the opportunity to engage with the Council regarding the preparation of the proposed 'Garden Town Community parking approaches and standards', in order to ensure sufficient provision is delivered as part of the masterplanning process for the site.
- 20 **SP4(C)(xvii)** relates to sustainable design approaches. Whilst the "highest standards of energy efficiency and innovation in technology" is a positive aspiration, it is imprecise as a policy requirement and may not necessarily be viable or achievable. The policy requirement must be clarified for the policy to be effective.
- 21 **SP4(C)(xviii)** seeks to ensure "that appropriate measures are put in place to equalise and apportion the cost of shared infrastructure and associated land contributions". We consider that this reference needs further clarification to explicitly state what measures the EFDC are seeking to implement and how these will equalise costs and land contributions. Without such clarification we cannot comment on the appropriateness or potential impacts of such a measure. The Council will, in particular, need to address how the land and build costs of the proposed secondary schools are to be apportioned between developers and across local authority boundaries.
- 22 It should be noted that the term 'equalisation' has a limited meaning and therefore application. It will not necessarily be possible to achieve equalisation across different sites. At present Latton Priory is capable of being delivered without any third party land. In the event third party land becomes included within the proposed allocation then there is a risk that this could delay the delivery of the primary site.