



**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

**Paras 2.103 to 2.120 Garden Town Communities and policies overview

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:



GARDEN TOWN COMMUNITIES - PARAGRAPHS 2.103 TO 2.120 AND POLICIES OVERVIEW

HARLOW AND GILSTON GARDEN TOWN

- 1 As highlighted earlier in this representation, Epping Forest District Council, Harlow Council and East Hertfordshire District Council are working in partnership together with Hertfordshire County Council, Essex County Council, Hertfordshire Local Enterprise Partnership, South East Local Enterprise Partnership, land owners and promoters to bring forward transformational growth in the form of Harlow and Gilston Garden Town.
- 2 On 2 January 2017 the Government announced its support for the Expression of Interest submitted to the locally-led Garden Towns prospectus on behalf of the Councils. The Councils have produced a shared vision and set of objectives, recognising that areas in and around Harlow present a number of opportunities to deliver growth of considerable scale and significance. Such growth is key not only to meet growing pressures of housing and infrastructure need locally, but also in delivering broader regeneration and change for Harlow.
- 3 The Garden Town lies in the core area of the 'London Stansted Cambridge Corridor' (LSCC) - one of the most important and fastest growing economic regions in the country.
- 4 The Council indicates that the Garden Town represents a major opportunity to accommodate around 16,000 homes up to 2033 between the global centres of London and Cambridge. The Garden Town will provide a mix of development, including employment, schools and community facilities.
- 5 Harlow and Gilston Garden Town comprises four new Garden Town Communities:
 - East of Harlow;
 - Latton Priory;
 - Water Lane Area ; and
 - Gilston.
- 6 Three of these Communities (East Harlow, Latton Priory and Water Lane Area) lie within or partially within Epping Forest District and so are central to the spatial strategy for the Pre-Submission Local Plan.

OVERVIEW

- 7 Policies SP4 and SP5 relate to the new Garden Town Communities within Epping Forest District. Comments on the individual policies are set out in turn below.
- 8 There is notable repetition and overlap between the sections of the Plan that deal with Policies SP4 and SP5, both in the policy wording and supporting text. Each policy should have distinct subject matter and content, but the current wording is confusing and imprecise.
- 9 In the interests of soundness the policies should be restructured. Both policies could be edited down significantly if repetition and overlap is cut out. This is important to ensure the policies are effective.

- 10 In this respect, Policy SP4 should deal more clearly with (and be confined to) the key broad principles that apply to the three Garden Town Communities collectively. Policy SP5 should then deal with the site-specific requirements for each site, avoiding repetition of the general principles for all Garden Town Communities covered in Policy SP4.
- 11 Furthermore, although each policy is preceded by supporting text, this often merely pre-states the policy requirements which are then repeated in the main policy wording. The role of supporting text should be to elaborate and justify key policy principles rather than simply state them in advance of the policy.

