



**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 SP2 - Employment

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 SP2 – Employment

- 1 Policy SP2 states that employment needs will be provided for over the plan period 2011-2031 by retaining and enhancing existing employment sites; allocating 23 hectares of new employment land across the District; and promoting new small-scale employment opportunities within mixed-use developments, including at the Garden Town Communities.
- 2 Before commenting on the extent of the employment requirement, we note that there is a typographical error in Table 2.5 'Employment Requirements: 2011-2033', as the first two rows of the table are both labelled 'Employment land (B uses) required 2016-2033 for offices', with '2-5ha' recorded for the first line and '14ha' recorded for the second. Based on the conclusions of the West Essex and East Hertfordshire Assessment of Employment Needs (October 2017), it appears that the second line (14ha) should instead relate to 'Employment land (B uses) required 2016-2033 for industrial (manufacturing and logistics)'.
- 3 In terms of the level of employment need, the 2017 Assessment of Employment Needs refers to potential for jobs growth of approximately 10,800 within Epping Forest District across the entire 2011-33 plan period, as acknowledged in paragraph 2.51 of the Plan. This equates to an annual job-based requirement of 491 jobs, of which 7,800 are expected to come forwards between 2016 and 2033. The 2017 Assessment of Employment Needs therefore estimates a future sites and premises requirement for Epping Forest District of 2-5ha of office and 14ha of industrial floorspace.
- 4 The 2017 Assessment of Employment Needs also identifies the employment needs for the rest of the Functional Economic Market Area (FEMA), namely East Herts, Harlow and Uttlesford. Page (v) of the report however states that:

"...there remains a small shortfall in forecast jobs to balance the labour market and maintain 2011 commuting rates. It is estimated, in line with the core analysis, without any increase in densities that a further 6,400 sq m of office floorspace and 8,700 sq m of industrial floorspace will be required to accommodate the shortfall. This will require a further 2.8 – 3.8 hectares of land in addition to the requirements set out in figure 5 [Preferred Scenario – Total Estimated Future Sites and Premises Requirements – FEMA 2016-33]."

"Figure 6 [Total Estimated Future Sites and Premises Requirements 2016-33] sets out the breakdown by district. The unallocated figure will need to be accommodated within the FEMA through agreement between the districts."
- 5 This is also acknowledged within the Hardisty Jones Employment Review (December 2017), however there does not appear to be any reference within the Pre-Submission Plan or its evidence base confirming whether an agreement has been reached between the FEMA districts as to how this unallocated figure will be distributed. This needs to be confirmed as part of the examination process to ensure that the employment needs of the FEMA are met in full, to ensure the soundness of the Plan. This is particularly important given that the very high occupancy rates in Epping Forest District currently limits the capacity for the market to operate effectively in terms of growth and movement, as identified in section 5.1.4 of the 2017 Employment Review.

- 6 The final recommendation of the 2017 Employment Review (p.30) states that: "There is no evidence that [Epping Forest] District currently serves a wider Harlow market area and no evidence emerged from the 2015 or 2017 FEMA studies indicating that there is a need to meet Harlow requirements or serve the Harlow market. There is therefore no clear requirement for the spatial strategy to address this." We would question the validity of this statement however given the additional unallocated employment floorspace identified above.
- 7 The 2017 Employment Review also notes that more than 24.2 ha of employment land have been lost across the District over the last seven years, with a further 11.6 ha identified as being at risk as a result of prior approvals and planning permissions. It is unclear however whether/how the impact of this has been considered in the formulation of the Council's targets for new/enhanced employment space under Policy SP2.
- 8 In respect of the spatial distribution of the proposed new employment land allocations, supporting paragraph 2.73 states that:
- " *The spatial distribution of the sites has also sought to reflect the employment needs identified across the District, particularly taking into account the need for additional space to serve employment markets in the south of the District, including at Loughton and Waltham Abbey. Significant employment opportunities already exist at Harlow through the relocation of Public Health England and the Enterprise Zone, and further small-scale employment uses will also be provided within the Garden Town Communities to promote the sustainable growth of Harlow and reduce out-commuting.*"
- 9 We question the emphasis that the Plan places on the provision of new employment space in the south of the District and away from Harlow. The 2017 Assessment of Employment Needs notes that an uplift of 2,500 jobs was made at Harlow itself to capture the opportunities within Harlow District itself (given the relocation of PHE and the Enterprise Zone). Outside the administrative boundary of Harlow however, consideration should also be given to the locational advantages of providing additional areas of employment as part of the Garden Town Communities around the edge of Harlow, and in particular Latton Priory, given the site's proximity to Junction 7 of the M11.
- 10 The Plan also states that a significant proportion of new floorspace is capable of coming forward through the regeneration of existing employment sites (paragraph 2.75 refers). We question the significant emphasis that the Plan places on meeting employment requirements through the enhancement of existing sites given the inherent difficulties with this, particularly in light of the very high levels of occupancy in the District.
- 11 In light of the above we would therefore question why the third principle of providing for employment needs (i.e. promoting new small-scale employment opportunities within mixed-use developments, including at the Garden Town Communities) only refers to "small-scale" employment opportunities, whereas sites such as Latton Priory provide an opportunity for larger scale employment opportunities as well. Indeed, maximising the amount of employment floorspace at the Garden Town Communities where appropriate would align with the garden suburb philosophy which seeks to address daily demands within the development, whereas the current "small scale" approach appears to contradict this (and in the case of Latton Priory refers only to an existing employment area which may not result in a net gain in jobs).

