



**Epping Forest
District Council**

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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.

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 - Housing Supply

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.

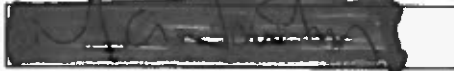
10. Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination (Please tick)

Yes No

11. Have you attached any documents with this representation?

Yes No

Signature:



Date:



POLICY SP2 – Housing Supply

- 1 Paragraphs 2.59 – 2.63 of the Plan address housing supply. The Plan suggests that the majority of supply in the first five years post-adoption is expected to come from smaller site allocations, as the strategic sites “will not begin delivering new homes until later in the Local Plan period”. Paragraph 2.62 also goes on to state that “the planned Garden Communities will make a significant contribution over the plan period but will not supply much over the first five years of the Plan”.
- 2 It should not be assumed that all strategic sites will make only a limited contribution to completions in the early years of the Plan, and to the Council's five year housing land supply. Latton Priory in particular due to its single ownership and limited infrastructure requirements (in relation to the other strategic sites) can make a contribution within the five-year period.
- 3 Research undertaken by NLP¹ demonstrates that larger sites can deliver more homes per year over a longer time period than smaller sites and, whilst they generally have longer lead-in times, the research is clear that:

“As well as identifying some of the common factors at play during the promotion and delivery of these sites it also highlights that every scheme has its own unique factors influencing its progress: there can be significant variations between otherwise comparable developments, and there is no one ‘typical scheme’. This emphasises the importance of good quality evidence to support the position adopted on individual projects. (Boyer emphasis)”
- 4 Lead-in times on individual sites will be dependent on a number of factors, including, amongst others, the time taken for the new Local Plan to be adopted (to give developers/landowners sufficient certainty on the principle of development); whether the site is in multiple ownerships (and if so, how many), and the infrastructure needed to support higher levels of development in each respective.
- 5 It is important that the housing trajectory in the new Local Plan includes realistic assumptions about the rate at which larger housing sites will deliver to ensure that supply is maintained throughout the plan period. Latton Priory is in single ownership and so is well placed to begin delivering new housing relatively quickly once the Plan is adopted. Compared to other strategic sites, Latton Priory is less dependent that the other Garden Communities on strategic infrastructure. With multiple site outlets, direct access to Junction 7 of the M11 and sales rates least likely to be impacted by or to impact on allocations in other locations delivery will be unimpeded. This is an important consideration given that the Council acknowledges that it will not have a 5 year land supply in the early years of the Plan period.

¹ ‘Start to Finish: How Quickly to Large-Scale Housing Sites Deliver?’ (NLP, 2016)

- 6 The Housing Trajectory at Appendix 5 of the Plan suggests that Latton Priory will begin delivering housing in 2021/2022 (the same year as Water Lane Area and East of Harlow). It is unclear from the evidence base how these expected dates/rates of delivery have been devised, and the anticipated trajectory for all three of the Garden Town Communities follows a broadly similar pattern. At East of Harlow however, it is not yet known whether the site masterplan will need to accommodate the relocation of the Princess Alexandra Hospital from its current site in Harlow. Given that Latton Priory is not dependent on such an unknown, and is in single ownership, it is therefore not unreasonable to expect the site to start delivering new housing sooner in the Plan period. This is discussed further later in this representation in response to Policy SP5.
- 7 The NLP research also identifies that the average annual build out rate for schemes of 2,000+ dwellings is 161 dwellings. The Housing Trajectory suggests that East of Harlow will deliver 200 dpa from 2022/23 onward and so we would also question how realistic this rate of delivery is given the lack of specific evidence in respect of the Housing Trajectory. Also, the rate of development at the East of Harlow site will be constrained by the existing committed development close to this location and the further development proposed for allocation in the Harlow Local Plan, as the market can only support a limited number of completions within one small geographical area.

