

Part B – Your representation on the Main Modifications and/or supporting documents

If you wish to make more than one representation, please complete a separate [Part B form](#) for each representation

4. Which **Main Modification number and/or supporting document** does your representation relate to? (Each Main Modification within the Schedule has a reference number. This can be found in the first column i.e. MM1, MM2 and each Supporting Document has a reference number beginning with ED).

Any representation on a supporting document should clearly state (in question 6) which paragraphs of the document it relates to and, as far as possible, your comments should be linked to specific Main Modifications. You should avoid lengthy comments on the supporting documents themselves.

MM no.

Supporting document reference

5. Do you consider this **Main Modification and/or supporting document**:
(Please refer to the Guidance notes for an explanation of terms)

a) Is Legally compliant Yes No

b) Sound Yes No

If no, then which of the soundness test(s) does it fail

Positively prepared Effective

Justified Consistent with national policy

6. Please give details of why you consider the **Main Modification and/or supporting document** is not legally compliant or is unsound. 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.

This response to the Main Modifications consultation is prepared by Pegasus Group on behalf of Martin Grant Homes and Harcourt Developments who have land interests at Latton Park, London Road, Harlow within the administrative boundary of Epping Forest (site reference: SR-0092).

Comments have previously been submitted to Epping Forest Council and Harlow Council (due to the cross-border connections) during the previous Local Plan stages. These previous comments remain valid and should be read in conjunction with these comments.

MM15 inserts the reference to 10,800 jobs into Policy SP 2. As submitted in our earlier representations to the Local Plan Examination and in our comments to MM13, it is not clear if the 10,800 new jobs and 23 hectares of employment land allocated in Policy SP2 is appropriate. This is based on out dated and inaccurate evidence base documents which do not take into account the changing needs of the employment sector following the COVID-19 pandemic and Britain's withdrawal from the European Union. The figure in the plan of 10,800 jobs in Epping Forest, produces a requirement for 52,400sqm of office space and 81,700sqm of industrial space between 2011 and 2033.

In the absence of any analysis of the variance in re-use rates for office space, it is difficult to accurately set the subsequent floorspace requirements. In particular, the variability between districts' short term and longer-term re-use rates is notable. Some have increased significantly (Uttlesford: 25% long-term vs 42% short-term), some have decreased significantly (East Herts: 62% long term vs 47% short-term).

If the long-term re-use rate in Epping Forest was applied this would create an additional need of 8,200sqm over the 2011-2033 time period based on the 10,800 jobs forecast. While this may not seem too substantial on its own, across the FEMA area and given some of the broad differences between long and short-term re-use rates, the variance would be highly significant if long-term re-use rates were used. Given the duty to co-operate across authority boundaries to meet FEMA wide meet requirements, such a potential variance cannot be overlooked.

As such, we conclude that more analysis and justification is required to determine the most appropriate re-use rates as these are critical in determining floorspace requirements. This means that it cannot be said with any certainty that the Plan provides sufficient floorspace for 10,800 jobs, nor, can it be said if 10,800 is a robust enough number of jobs to plan for given the reasons stated previously relating to changing market factors.

The plan identifies 23ha of potential development sites to meet employment need. These are spread across five sites, with 20ha of this - or 85% - allocated to just two sites – North Weald Airfield and land north of the A121, south of Waltham Abbey. One of these, North Weald, is allocated to B1A office use. Without greater clarity on floorspace need and re-use rates it is hard to assess if these allocations are sufficient. What is clear is that the Plan is heavily reliant on just two sites to deliver the vast majority of its employment needs. Outside of these two large sites, industrial estates at Langston Road and Galley Hill Road and land at Dorrington Farm are identified as delivering 1ha each.

It is evident then that the Plan is severely limited in terms of employment development options and reliant on the aforementioned re-use opportunities, the scale of which we would suggest is not yet possible to determine with sufficient certainty.

The North Weald site presents the most sustainable option with easy access to main road and motorway networks and relative proximity to Epping underground station. However, options remain severely limited for employment land, especially in the north and east of the district. Any difficulties or obstacles regarding deliverability on a site such as North Weald or the A121 site, will leave the district entirely reliant on re-use and the three small industrial estate. Of these two are in rural locations with small road access only.

Overall, we would reiterate the importance of identifying more employment sites, a need further identified in the HJA 2017 Employment Needs study. We would suggest the emergence of the 2017 EEFM update forecasts, that contain substantial additional employment growth to 2033, only increases the importance of identifying additional sites.

In particular, the site LPA reference SR-0092, we would suggest represents an obviously more sustainable and accessible location at the M11 junction #7 than the Galley Hill Road and Dorrington Farm locations, while also offering a valuable north district site that will support planned and forecast employment growth for Harlow, including potential further growth beyond that set out in the HJA 2017 report, indicated in the 2017 EEFM forecasts.

Epping Forest in particular, as referenced in the HJA Economic and Employment Evidence study (EB600b), is widely recognised as a dormitory district, lacking appropriate employment space. As a result, it contends with high levels of out-commuting, adding to sustainability pressures. This is further reasoning for establishing not only additional employment space but a range of space, from grow on space and flexible workspace to high end corporate facilities. These needs are clearly identified and expressed in the consultations set out in the HJA.

There is limited reference in Policy SP2 as to which sectors are to be promoted within the District and whether the sites identified can meet the needs of emerging sectors. The points listed under section F of the Policy do not go far enough in relation to meeting the ever-changing needs of an employment sector which has been significantly impacted by the COVID-19 pandemic and Britain's withdrawal from the European Union. There is limited mention of the storage and distribution sector, logistics companies or the sustainability sector.

It is considered that this Policy where it relates to employment needs (Section E) needs to be reviewed as a whole with an updated evidence base as part of the next Local Plan review to ensure that it meets the future needs of a changing employment sector and it allocates a sufficient quantum of employment land in appropriate locations to meet these changing needs and sectors.

7. Please set out what change(s) you consider necessary to make the **Main Modification and/or supporting document** 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.

Text to be amended to state that the jobs growth as set out in Policy SP2 will be assessed as part of an immediate review of the adopted Local Plan, as outlined in Policy D8

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

(Continue on a separate sheet if necessary)

8. Have you attached any documents with this representation which specifically relate to an MM or supporting document?

Yes

No

Signature:

G.Rowan

Date

23.9.21