

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.

MM112 sets out the requirements for an early review of the Local Plan as set out in Draft Policy D8. The Council needs to complete a review of the Local Plan policies and publish its conclusions at least every five years. As set out above under comments on MM15 and MM18, the evidence base for the employment strategy and justification for the employment land allocations is out dated and inaccurate and there is an immediate need to review this to ensure that the Local Plan can respond positively to the economic requirements of the District.

The Policy states that conclusions from the first review will be published no later than five years from the adoption date of the Plan (anticipated to be 2027). However, it I considered that the policy should include a target date for the completion of the review to provide a focus for the Council to work towards. It will also reduce the chance of failure to progress the plan review and the prospect of the Council facing further challenges in respect of housing supply and delivery and economic growth in the longer term. A commitment to commence a review immediately on the adoption of this Plan will ensure that the review will be completed and ensure the allocation of sufficient sites for employment to meet economic needs at least until the end of the plan period and in subsequent years.

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.

*Draft Policy D8 should be modified to read as follows: A. The Council **commits to undertaking a full review of the Local Plan policies immediately following adoption.** ~~Conclusions from the first review will be published no later than five years from the adoption date of the Plan~~*

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