

Stakeholder Reference:

Document Reference:

Part A

Making representation as Resident or Member of the General Public

Personal Details		Agent's Details (if applicable)
Title	Mr	
First Name	Liam	
Last Name	Lakes	
Job Title (where relevant)		
Organisation (where relevant)	Aldgate Associates Ltd	
Address		
Post Code		
Telephone Number		
E-mail Address		

Part B

REPRESENTATION

To which further Main Modification number and/or supporting document of the Local Plan does your representation relate to?

MM no: 1

Supporting document reference: A. Council's response to Actions outlined in Inspector's note to Epping Forest District Council (Examination Document reference number ED141), October 2022 (ED144-ED144A)

Do you consider this further Main Modification and/or supporting document of the Local Plan to be:

Legally compliant: No

Sound: No

If no, then which of the soundness test(s) does it fail? Positively prepared, Effective, Justified

Please give details of why you consider the further Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise and concise as possible. If your response exceeds 300 words please also provide an executive summary of no more than 300 words. 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.

The Exceptional Circumstances required for removal of large areas of Green Belt in the district (in particular the WAL.E8 site on Dowding Way) do not exist. The council has failed to effectively engage with the public representations on this matter. The council also brought the submission version of the draft Local Plan to Councillors for a vote in Dec-17 before the Arup study was available in Mar-18 - effectively denying the council members the opportunity to review the purported Exceptional Circumstances relied upon. The Local Plan does not justify the need for the additional employment land in Waltham Abbey (and ignores the windfall effect of the adjacent extended Sainsbury's warehouse). The council have colluded with the developer and held secret meetings to enable development of adjacent council owned land without disclosing details to local Councillors or the public. Should the Local Plan be adopted with the removal of the WAL.E8 site from Green Belt there are substantive grounds to pursue a Judicial Review for the unlawful actions of the council and their failure to follow due process.

Please set out what change(s) you consider necessary to make the further 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 and concise as possible. If your response exceeds 300 words please also provide an executive summary of no more than 300 words.

WAL.E8 site to be remain as Green Belt and be removed from employment development land allocation

Signature: Liam Lakes Date:
06/12/2022