

Name:

David Lock Associates on behalf of Hallam Land Management Ltd and CEG Ltd

Part B – Your representation on the further 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 and clearly print your name at the top of this form.

4. Which further Main Modification and/or supporting document does your representation relate to? (Representations are only invited on further Main Modifications within the Schedule. These are denoted by red text. The reference number can be found in the first column in red i.e. **MM2**, **MM11** 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 further Main

MM no.

MM43

Supporting document reference

5. Do you consider this further 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 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.

Please refer to Separate sheet appended to this form for our position on MM43.

CEG/HLM have no objections for the provision at strategic level of the general principle and alignment of the STC corridors.

The commentary in the separate sheet document expresses concern only with any suggestion that the policies map is seeking to identify specific or detailed alignment to or within each garden community. No change is sought to MM43.

(Continue on a separate sheet if necessary)

7. 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.

No change is sought to MM43.


(Continue on a separate sheet if necessary)

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

Yes

No

Signature:



Date

09/12/2022

Epping Forest District Local Plan - Further Main Modifications Consultation

Representations on Behalf of CEG Ltd and Hallam Land Management Ltd

MM43

This document sets out the representations made in response to the consultation on the Further Main Modifications (28 Oct – 9 Dec 2022) to the Epping Forest District Local Plan 2011-2033 (Submission Version December 2017) The representations are submitted by David Lock Associates (DLA) on behalf of the land promoters, Hallam Land Management (HLM) and CEG, who are the promoters and prospective developers of Latton Priory garden community.

MM43 proposes a new element of policy before Part A and amend Part A of Policy T2 to state that land will be safeguarded for the delivery of the STC as part of the development of the Harlow and Gilston Garden Town 'as identified on the Policies Map' and to align with MM21 where similar wording was added to policy SP5 as part of the July 2021 Modifications. Whilst the additional reference to the Policies Map may add clarity, currently the EFDC Local Plan Policies Map does not clearly define the area of the STC relating to each of the strategic sites, presumably as these pass through the jurisdiction of Harlow District Council.

New Map 2.X (July 2021 and Oct 22) shows the Sustainable Transport Corridors in the HGGT but these are depicted by thick lines and indicative potential routes only. Development proposals and Strategic Masterplans can only safeguard the land within their site boundaries.

HLM and CEG have no objections for the provision at strategic level of the general principle and alignment of the STC corridors. The commentary above expresses concern only with any suggestion that the Policies Map is seeking to identify specific or detailed alignments to or within each garden community. No change is sought to MM43.