

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.

MM46

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 representation form

CEG/HLM welcome the modifications which ultimately provide further guidance in the preparation and assessment of applications to ensure development proposals do not adversely impact the SAC and other sensitivities and which should avoid the previous issues of applications needing to be held in abeyance due to the absence of appropriate strategies.

(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 MM46


(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

MM46

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.

New Paragraphs following split Paragraph 4.20 to policy DM2 advise that; 'planning applications need to be supported by sufficient information to enable the Council to conclude that the proposals would not result in an adverse effect on the integrity of Epping Forest SAC or the Lee Valley SPA/Ramsar sites'. The text has been amended referring to the Air pollution Mitigation Strategy (AMPS) for Epping Forest which includes a number of specific measures and how they would be delivered to ensure there would be no adverse effect on the integrity of the Epping Forest SAC in relation to atmospheric pollution and in relation to HRA 2022.

The text has also added additional information about what is needed to support planning applications which fall within the 'Zone of Influence' (6.2km of the Forest), defined by the Epping Forest Green Infrastructure Strategy. The FMM introduces Epping Forest Strategic Access Management and Monitoring (SAMM) Strategy which identifies measures that are capable of being delivered within the Forest and how they will be delivered. SAMM Strategy will seek financial contributions from new housing developments to mitigate impact from additional visits to the Forest which will need to be negotiated and included in a future S106 Agreement.

CEG and HLM welcome the modifications which ultimately provide further guidance in the preparation and assessment of applications to ensure development proposals do not adversely impact the SAC and other sensitivities and which should therefore avoid the previous issues of applications needing to be held in abeyance due to the absence of appropriate strategies.