

Name:

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. 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 sheets appended to this representation for our position on MM72.

MM71 reduces paragraph 4.149 and policy DM20 to create a shorter policy that simply seeks the incorporation of renewable energy installations and energy efficiency measures in new developments. However, this approach is not quite reflected in the text under the heading Amend Part D as part of MM72. This seeks 'Strategic Masterplans should demonstrate how the development will employ on-site low carbon technologies, and/or other energy efficient measure (for example, infrastructure to connect to an existing or future planned decentralised energy network) to help meet national and local plan energy and carbon reduction objectives'.

The 'for example' wording in brackets is not considered necessary and adds further details which is over and above policy DM20 additions. It is therefore neither effective or justified.

Also demonstrating and providing any detail on low carbon or renewable technologies as the Strategic Master Plan stage will be challenging. The HGGT has Sustainability Guidance and Checklist Document which has been endorsed by the District Councils and has material planning weight. It is considered more appropriate for the MM wording to follow this approach in seeking proportionate and appropriate amount of detail on off-site low carbon and renewable technologies rather than MP stage.

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.

In order to ensure the soundness of policy DM20 (D) it is proposed that the MM72 be modified as follows:
" **Strategic Masterplans should demonstrate (insofar as is appropriate in a strategic rather than detail planning document) how the development may employ on site low carbon or renewable technologies, and other efficiency measures to help meet national energy and carbon reduction standards**".


(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

MM72

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.

MM71 reduces paragraph 4.149 and policy DM20 to create a shorter policy that simply seeks the incorporation of renewable energy installations and energy efficiency measures in new developments. However, this approach is not quite reflected in the text under the heading Amend Part D as part of MM72. This seeks that 'Strategic Masterplans should demonstrate how the development will employ on-site low carbon or renewable technologies, and/or other energy efficient measures (for example, infrastructure to connect to an existing or future planned decentralised energy network) to help meet national and local plan energy and carbon reduction objectives'.

The 'for example' wording in brackets is not considered necessary and adds further detail which is over and above policy DM20 additions. It is therefore neither effective or justified.

Moreover, it is important to note that demonstrating and providing any detail on low carbon or renewable technologies at the Strategic Masterplan stage will be challenging in the absence of site-specific design proposals at such an early stage. The HGGT has a Sustainability Guidance and Checklist document which has been endorsed by the District Council's and therefore has material planning weight. This provides an indication of the level of detail which is appropriate to be provided at the varying stages; Strategic Masterplan; outline application and reserved matters application. It is therefore considered more appropriate for the MM wording to follow this approach in seeking a proportionate and appropriate amount of detail on off site low carbon and renewable technologies rather than specifying detail at Strategic Masterplan stage.

To be consistent with national policy guidance, it is national and not national and local plan energy and carbon reduction objectives that are relevant.

In order to ensure the soundness of policy DM20 (D) it is proposed that the MM 72 be modified as follows: "**Strategic Masterplans should demonstrate (insofar as is appropriate in a strategic rather than detailed planning document) how the development may employ on site low carbon or renewable technologies, and other energy efficiency measures to help meet national energy and carbon reduction standards**".