

Representation form: Consultation on the further Main Modifications to the emerging Local Plan

Important Note: this stage of consultation is limited to the proposed further Main Modifications to the Plan only

This form should be used to make representations on the further Main Modifications to the Epping Forest District Local Plan Submission Version 2017 to the Local Plan Inspector. The Main Modifications Schedule clearly denoting the further Main Modifications, online response form, and all required supporting documentation can be accessed via the Examination website at www.efdclocalplan.org. Please complete and return representations by Friday 09 December at 5pm.

Please note, the content of your representation including your name will be published online and included in public reports and documents.

It is important that you refer to the [guidance notes](#) on the Examination website before completing this form.

The quickest and easiest way to make representations is via the online response form at www.efdclocalplan.org.

If you need to use this downloadable version of the form please email any representations to MMCons@eppingforestdc.gov.uk

Or post to: FMM Consultation 2022, Planning Policy, Epping Forest District Council, Civic Offices, 323 High Street, Epping, Essex, CM16 4BZ

Representations must be received by 5pm on Friday 09 December 2022

This form is in two parts:

Part A – Your Details

Part B – Your representation(s) on the further Main Modifications and/or supporting documents.
Please fill in a separate Part B for each representation you wish to make.

The Main Modifications Schedule clearly denoting the further Main Modifications and supporting documents can be accessed online at www.efdclocalplan.org. The supporting documents to the further Main Modifications are listed below. Representations concerning their content will be accepted to the extent that they are relevant to inform your comments on the further Main Modifications. However, you should avoid lengthy comments on the evidence/background documents themselves.

- 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)
- B. Sustainability Appraisal Report Addendum, October 2022 (ED148/ EB214)
- C. 2022 Habitats Regulations Assessment, October 2022 (ED149-ED149A/EB215A-B)

No representations should be made about parts of the Plan that are not proposed to be modified nor upon Main Modifications that were consulted upon in 2021 and which have not changed. Consultees should not re-submit previous representations. Such responses will not be considered by the Inspector.

Please only attach documents essential to support your representation. You do not need to attach representations you have made at previous stages.

Part A – Your Details

1. Are you making this representation as? (Please tick as appropriate)

a) Resident or Member of the General Public ☐ or

b) Statutory Consultee, Local Authority or Town and Parish Council ☐ or

c) Landowner ☐ or

d) Agent ☐

Other organisation (please specify)

Developer

2. Personal Details

3. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="David"/>	<input type="text"/>
Last Name	<input type="text" value="Hill"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Strategic Land and Planning Manager"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Dandara Eastern"/>	<input type="text"/>
Address Line 1	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 2	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 3	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 4	<input type="text" value="REDACTED"/>	<input type="text"/>
Post Code	<input type="text" value="REDACTED"/>	<input type="text"/>
Telephone Number	<input type="text" value="REDACTED"/>	<input type="text"/>
E-mail Address	<input type="text" value="REDACTED"/>	<input type="text"/>

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

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 Modifications. You should avoid lengthy comments on the supporting documents themselves.

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.

The additions to Policy D7, in relation to the requirement for a potential review are supported, bringing the policy more in line with the NPPF.

However, in relation to the circumstances of when a review should take place in advance of the initial 5 year period: the 2nd paragraph, relating to a lack of 5 year land supply, needs to refer to the standardised housing figures or national guidance as an option for the derivation of housing targets as the current wording restricts the calculation, solely to the local plan and Housing Implementation Strategy figure. This would not appear to be justified, given the text in Paragraph 33 of the NPPF and what it states in relation to housing need. The necessary flexibility needs to be included in the policy to illustrate a significant change in circumstance, not just existing local plan targets, which could be significantly out of date at this point in time..

(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.

Change to the wording of the policy, to include reference to national housing targets / national guidance reflecting NPPF commentary on significant change in housing need / requirements as a mechanism for review.

(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:

David Hill

Date

06/12/2022

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

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 Modifications. You should avoid lengthy comments on the supporting documents themselves.

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)

c) Is Legally compliant Yes No

d) 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.

In order to truly support the low carbon economy and seek to minimise the production of carbon, the local plan needs to be based on a growth strategy, which moves away from car-dependent development.

It would appear to be too late in the day to change the current development strategy at this point in time, but the local plan review needs to consider the opportunities for development around rail travel, recognising the sustainability benefits that they can bring. The SA/SEA should be at the heart of any development strategy in a future review.

This appears to be an opportunity missed in this iteration of the plan, given global temperature rise and the climate crisis and should be fully investigated as part of the review of the local plan.

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.

The importance of rail infrastructure needs to be referenced in any potential future review as a mechanism to combat the climate crisis and reduce carbon emissions from development.

A forward-thinking approach to this issue is needed now and should be referenced in this iteration of the plan.

(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?

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Yes

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No

David Hill

06/12/2022

