

**Representation form for Submission Version of the
Epping Forest District Local Plan 2011-2033 (Regulation 19 publication)**

Part A

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)

2. Personal Details

3. Agent's Details (if applicable)

Title

First Name

Last Name

Job Title (where relevant)

Organisation (where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number


E-mail Address

EPPING FOREST DISTRICT COUNCIL NEIGHBOURHOODS	
REC'D	29 JAN 2018
ACK
REFERRED TO

I fully endorse the submission made by

I played a large part in the preparation of the above referred submission and wish to submit its entire contents also from me as an individual.

If you require another set of printed Part Bs, please get in touch.


29 January 2018

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Epping Forest District Local Plan 2011-2033 (Regulation 19 publication)**

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[Redacted Signature]

29.1.2018

Part B – If necessary please complete a separate Part B form for each representation

4. To which part of the Submission Version of the Local Plan does this representation relate?
(Please specify where appropriate)

Paragraph	1.2 Bullet 4	Policy		Policies Map	
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Site Reference		Settlement	
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5. Do you consider this part of the Submission Version of the Local Plan: *Please refer to the Guidance notes for an explanation of terms

a) Is Legally compliant

b) Sound

If no, then which of the soundness test(s) does it fail*

Positively prepared		Effective	X
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Justified		Consistent with national policy	
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c) Complies with the duty to co-operate Yes / No

6. Please give details of why you consider the Submission Version of the Local Plan is not legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. 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

SME builders

Paragraph 1.2 of the Local Plan at bullet 4 refers to policies to build a strong, competitive economy but there are few if any policies directed at that responsibility. In order to have a strong economy we need new businesses and competition depends on many firms in a market jostling together for business. Such an environment creates its own entrepreneurial dynamism and tends to oppose the natural sluggishness of big businesses in mature markets.

Paragraph 43 of the recommendations of the HOUSE OF LORDS Select Committee on National Policy for the Built Environment (HL Paper 100) called for positive steps to help SME builders. I propose that any developer who gains permission for more than (say) 50 homes on any one site should be required to offer 10 per cent to SME builders. This would increase innovation and add to variety while stimulating local businesses. There is historic precedence for this practice (albeit not from a regulatory basis) as estates of Victorian houses were built in groups of houses by smaller firms, even in the same street.

I recognise that blocks of flats might not be conducive to this policy but large areas of housing most certainly would suit the practice.

The same HoL paper noted at paragraph 2 "the focus on quantity of housing must not work to the long-term detriment of planning for the whole of the built environment and the delivery of high quality development. Moves towards deregulation of the planning system, coupled with an intensification of housebuilding, have the potential to exert significant enduring impacts upon the built environment in England."

We should also note that the Chancellor of the Exchequer announced funding to help SME builders and we believe action at local plan level could be effective in that regard.

7. Please set out what change(s) you consider necessary to make the Submission Version of the Local Plan 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 as possible.

Adopt this policy

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

I wish to participate at the hearings **YES**

9. If you wish to participate at the hearings, please outline why you consider this to be necessary:

The issues are complex and the case cannot be stated in a few words on this response form.

10. Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination (Please tick) **YES**

11. Have you attached any documents with this representation?

Signature:

Date: