

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

This form should be used to make representations on the Main Modifications to the Epping Forest District Local Plan Submission Version 2017 to the Local Plan Inspector. The Main Modifications Schedule, online response form and all required supporting documentation can be accessed via the Examination website at [www.efdclocalplan.org](http://www.efdclocalplan.org). Please complete and return representations by Thursday 23<sup>rd</sup> September 2021 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.**

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The quickest and easiest way to make representations is via the online response form at [www.efdclocalplan.org](http://www.efdclocalplan.org).

If you need to use this downloadable version of the form please email any representations to [MMCons@eppingforestdc.gov.uk](mailto:MMCons@eppingforestdc.gov.uk)

Or post to: MM Consultation 2021, Planning Policy, Epping Forest District Council, Civic Offices, 323 High Street, Epping, Essex, CM16 4BZ

**By 5pm on Thursday 23<sup>rd</sup> September 2021**

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This form is in two parts:

Part A – Your Details

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

The Main Modifications Schedule and supporting documents to the Main Modifications can be accessed online at [www.efdclocalplan.org](http://www.efdclocalplan.org). The supporting documents to the 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 Main Modifications. However, you should avoid lengthy comments on the evidence/background documents themselves.

- A. Council's response to Actions outlined in Inspector's post examination hearing advice (Examination document reference number ED98), July 2021 (ED133)

- B. Sustainability Appraisal Report Addendum, June 2021 (June 2021) (ED128/ EB210)
- C. 2021 Habitats Regulations Assessment, June 2021 (ED129A-B/EB211A-B)
- D. Epping Forest Interim Air Pollution Mitigation Strategy, December 2020 (ED126/ EB212)
- E. EFDC response to Inspector's Post Hearing Action 5 and supplementary questions of 16 June 2021, July 2021 (ED127)
- F. Epping Forest District Council Green Infrastructure Strategy (ED124A-G/ EB159A-G)
- G. Harlow and Gilston Garden Town Latton Priory Access Strategy Assessment Report, July 2020 (ED121A-C/EB1420A-C)
- H. Revised Appendix 2 to the Epping Forest District Council Open Space Strategy (EB703), July 2021 (ED125/EB703A)
- I. IDP: Part B Infrastructure Delivery Schedule 2020 Update (ED117/EB1118)
- J. EFDC Consolidated and Updated Viability Evidence 2020 (ED116/ EB1117) Consolidated
- K. Statement of Common Ground Addendum East of Harlow, September 2020 (ED122A-B)
- L. South Epping Masterplan Area Capacity Analysis (Sites EPP.R1 and EPP.R2), March 2020 (ED120/ EB1421)
- M. In addition to the above there are a number of Examination Documents, which include Homework Notes produced by the Council as a result of actions identified by the Inspector at the hearing sessions as well correspondence between the Council and the Inspector following hearings. These Examination Documents can all be accessed on the [Local Plan website](#).

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

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## 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)

### 2. Personal Details

### 3. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Andrew"/>	<input type="text"/>
Last Name	<input type="text" value="Dutton"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Land &amp; Planning Consultant"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Consilium Land"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>

## Part B – Your representation on the 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 **Main Modification number and/or supporting document** does your representation relate to? (Each Main Modification within the Schedule has a reference number. This can be found in the first column i.e. MM1, MM2 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 Main Modifications. You should avoid lengthy comments on the supporting documents themselves.

MM no.

Supporting document reference

5. Do you consider this **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 **Main Modification and/or supporting document** is not legally compliant or is unsound. 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.

Para 47 of NPPF 2021 requires decisions on applications to be made "... as quickly as possible".

Para 69 of NPPF identifies the "important contribution" that can be made towards meeting the housing requirement of an area from small and medium sized sites". LA's are required to "promote the development of a good mix of sites" and to ensure that at least 10% of their housing requirement could be derived from sites of less than 1 Ha. Furthermore LA's are required to work with developers to encourage the sub-division of large sites where this would help speed up the deliver of homes". The proposed requirement in the Local Plan for all land within SP4.3, SP4.2 and SP4.1 to be subject to the masterplan process set out in Figure 2.1 runs contrary to these requirements.

*(Continue on a separate sheet if necessary)*

7. Please set out what change(s) you consider necessary to make the **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 as possible.

Each of the proposed allocations (SP4.1, SP4.2 and SP4.3) is comprised of a dominant landowner/promoter and a very small number of other minor landowner/promoters. MM21 proposes an amendment to the diagram to bring some of these smaller areas of land within that required for masterplanning. This change in itself is not the subject of this objection however I suggest that additional wording is introduced to enable the smaller areas of land to be brought forward independently from the dominant area if it can be demonstrated that by doing so it will not prejudice the dominant area from also being brought forward independently.

If wording is not introduced to permit this flexibility then the delivery of homes from SP4.1, SP4.2 and SP4.3 will inevitably be delayed. The value and importance of accommodating “early wins” in masterplanning has long been recognised. In para 3.6 its 2008 publication ‘Devising and delivering masterplanning at neighbourhood level - Some lessons from the New Deal for Communities Programme’ masterplanners are asked to “Consider the value of early wins” to help win community support. In doing so it is recognised that there is a need to balance the pressure to deliver on visible issues of immediate local concern with the requirements to take a long term strategic view.

The suggested new or additional policy wording is;

“Within the Strategic Masterplan Areas either individual applications or individual applications accompanied by Concept Frameworks as appropriate will be welcomed where it can be demonstrated that such applications will not compromised the production of Strategic Masterplans for the balance of the Strategic Masterplan Areas”

*(Continue on a separate sheet if necessary)*

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

☐

Yes

☒

No

Signature:

Andrew Dutton

Date

22<sup>nd</sup> Sept 2021