

Stakeholder Reference:
Document Reference:

Part A

Making representation as Agent on behalf of Landowner or Land Promoter

Personal Details		Agent's Details (if applicable)
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Last Name	Pike	Peirson
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Part B

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph: 2.27

Policy: SP 2 Spatial Development Strategy 2011-2033

Policies Map: No

Site Reference: None of the above

Settlement: Loughton

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: No

Sound: No

If no, then which of the soundness test(s) does it fail? Positively prepared, Effective, Justified, Consistent with national policy

Complies with the duty to co-operate? Don't Know

Please give details either 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; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible. Please use this box to set out your comments.

The Plans Spatial Distribution of Growth:

From our review of the Local Plan Submission it is clear the towns potential to sustainably accommodate growth has been underplayed, with low levels of growth identified (only 1,085 homes and 4,000sq.m of additional B1 development) relative to the wider Plan commitments. Loughton is one of the most sustainable locations in the District yet the Council disregards this and plans for development in less sustainable locations for example to urban extensions on the edges of Harlow.

These growth locations around Harlow are supposed to be linked as a Garden Towns, however, the spatial relationship between these extensions needs to be questioned, these extensions fail to deliver the sustainability benefits that would be achieved from a circa 4,000 homes developed in one location. It is considered that the needs of the area can be better met through the sensitive development of Woolston Manor.

Please see Woolston Manor reps document attached for more detail on this issue.

Please set out what change(s) you consider necessary to make the Pre Submission 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 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.

We suggest a total review of the Local Plan Strategy, the Local Plan approach needs to be reconsidered and more sustainable ways of development devised.

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

No, I do not wish to participate at oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph: 2.60, 2.61, 2.62, 2.63, 2.66, 2.134 and 2.142

Policy: H 1 Housing mix and accommodation types

Policies Map: No

Site Reference: None of the above

Settlement: Loughton

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: No

Sound: No

If no, then which of the soundness test(s) does it fail? Positively prepared, Effective, Justified, Consistent with national policy

Complies with the duty to co-operate? Don't Know

Please give details either 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; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible. Please use this box to set out your comments.

Five Year Housing Land Supply:

The contention is that the Council cannot demonstrate a 5 year housing land supply (5YHLS) at this time and that the Plan has not responded adequately enough to a serious and sustained housing delivery problem in the District across a number of years. From using established methodology wholly consistent with the approach and assumptions recently taken by the Inspector at the East Herts Examination-in-Public, we consider the Council has a 3.72 years

Please see Woolston Manor reps document attached for more detail on this issue.

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A review of the Local Plan Strategy is needed, the Local Plan approach needs to be fully reconsidered and more deliverable methods development need to be established to able more development to take place.

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REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph: 2.66, 2.134 and 2.142

Policy: DM 4 Green Belt

Policies Map:

Site Reference: None of the above

Settlement: Loughton

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: No

Sound: No

If no, then which of the soundness test(s) does it fail? Positively prepared, Effective, Justified, Consistent with national policy

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The Green Belt does not provide a robust evidence base for decision taking with respect to the location of Green Belt release and the development choices reached.

There are also key issues in the approach used in the Green Belt Review, including discounting logical Green Belt release sites due to them being within a floodplain and within close proximity to underground station.

Therefore the Green belt release within the submission Version is considered to be unsound.

Please set out what change(s) you consider necessary to make the Pre Submission 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 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.

We suggest a total review of the Local Plan Strategy, the Local Plan approach needs to be reconsidered and The Green Belt decision taking needs to be reconsidered.

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

No, I do not wish to participate at oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph:

Policy: None of the above

Policies Map: No

Site Reference: None of the above

Settlement: Loughton

Do you consider this part of the Pre Submission Local Plan to be:

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Due to Governments AON figure being 923 dwellings per annum greatly exceeding the Councils AON figure of 518 dwellings, there will need to be a significant increase in housing provision in the District in the next plan period and further Green Belt release is certain to be required to be released as part of a Local Plan review. Thus, this does not align with NPPF Paragraph 85 which requires Local Planning Authorities to be satisfied that Green Belt boundaries will not need altering at the end of the development plan period.

Please set out what change(s) you consider necessary to make the Pre Submission 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 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.

We suggest a total review of the Local Plan Strategy, the Local Plan approach needs to be reconsidered and a long term approach to Green Belt Review needs to be adopted, this approach must consider the need for long term Green Belt amendments in accordance with National Policy.

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

No, I do not wish to participate at oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination

No

Signature: Esme Sparrow Date: 29/01/2018