

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

This form should be used to make representations on the Submission Version of the Epping Forest District Local Plan which has been published. Please complete and return by 29 January 2018 at 5pm. An electronic version of the form is available at <http://www.efdclocalplan.org/>

Please refer to the guidance notes available before completing this form.

Please return any representations to: Planning Policy, Epping Forest District Council, Civic Offices, 323 High Street, Epping, Essex, CM16 4BZ

Or email them to: LDFconsult@eppingforestdc.gov.uk

BY 5pm on 29 January 2018

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Please attach any documents you wish to submit with your representation

Part A

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

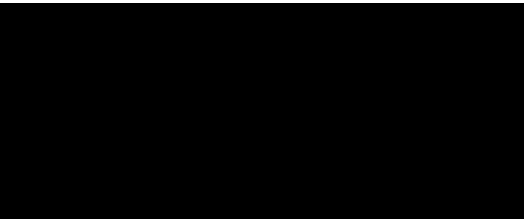
a) Resident or Member of the General Public ☐ or

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	<input type="text" value="Messrs"/>	<input type="text" value="Mr"/>	
First Name	<input type="text" value="John & Roger"/>	<input type="text" value="Paul"/>	
Last Name	<input type="text" value="Pryor"/>	<input type="text" value="Atton"/>	
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Associate Director"/>	
Organisation (where relevant)	<input type="text" value="C J Pryor Ltd"/>	<input type="text" value="JB Planning Associates"/>	
Address Line 1	<input type="text"/>	<input type="text" value="Chells Manor"/>	
Line 2	<input type="text"/>	<input type="text" value="Chells Lane"/>	
Line 3	<input type="text"/>	<input type="text" value="Stevenage"/>	
Line 4	<input type="text"/>	<input type="text" value="Herts"/>	
Post Code	<input type="text"/>	<input type="text" value="SG2 7AA"/>	
Telephone Number	<input type="text"/>		
E-mail Address	<input type="text"/>		

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 Policy Policies Map

Site Reference Settlement

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 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

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

Please see paragraphs 2 - 10 of enclosed representation.

(Continue on a separate sheet if necessary)

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.

Please see paragraphs 2 - 10 of enclosed representation.

(Continue on a separate sheet if necessary)

8. 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 the hearings

☒ **Yes**, I wish to participate
at the hearings

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

In order to enable the content of our written representations to be fully investigated through an oral examination.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

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 ☐ No

11. Have you attached any documents with this representation?

☒ Yes ☐ No

Signature:



Date:

29.1.18

Introduction

1. These representations are made on behalf of C J Pryor Ltd, who are the landowners of Land at Harlow Gateway South - A414 London Road, Harlow, Essex. These representations relate to the Regulation 19 Consultation on the Epping Forest District Draft Local Plan 2011-2033.

Land at Harlow Gateway South - A414 London Road, Harlow, Essex

2. C J Pryor Ltd confirm they are the owners of this site which fronts on to the A414 on the southern entrance to Harlow. The site area is 7.4 ha. It is located roughly equally distant from Junction 7 of the M11 to the southern built edge of Harlow town itself (please see the site plan within Appendix 1).
3. Within Appendix 1, we have enclosed a site plan and aerial photograph of the Harlow Gateway South land in context with its surroundings. Having studied the site context, C J Pryor Ltd contend that this would be a suitable allocation for B1, B2 B8 use classes.
4. Policy SP2 – Spatial Development Strategy 2011 – 2033 of the Plan criterion (E) seeks to provide land for employment needs (comprising 10,400 new jobs within the plan period) by both retaining and enhancing existing employment sites and premises, and allocating new land for employment within appropriate locations within the district as set out in Policy E1.
5. C J Pryor Ltd contend that the Harlow Gateway South site should be brought into the Plan as an employment allocation under policy P13 'Rural Sites in the East of the District'.
6. In principle, the site should be allocated because of its strategic location close to the M11 (Junction 7) on the main thoroughfare into Harlow from the motorway. With careful attention to design, built form and high quality landscaping it could potentially become a "showpiece" site for new employment in the town. We understand that the site has previously been considered for employment development and indeed historically, part of it could be regarded as previously developed land.

7. It would seem to us that there is potential here to strengthen the visual entrance into Harlow by adoption of large scale strategic frontage planting along the A414 and around the site perimeters. Presently, the southern approach from the M11 is unduly influenced by two petrol filling stations and other urban fringe type uses.
8. Given the Local Plan period is to 2033, and the need for flexibility in the range and type of employment sites within Epping Forest District (and required by the NPPF) over the plan period, then we contend that the Harlow Gateway South site should be included as an allocation.
9. There is an opportunity to enhance the approach to Harlow from the M11 - especially with early strategic planting – a “landscape led” scheme for the construction of new employment buildings. We are aware that elsewhere in the Plan, the Council are keen to promote Epping Forest District as a location within the London-Stansted-Cambridge Corridor. Given the range of new industries coming forward, including food and life sciences, start up space and general support for small and medium sized enterprises, and especially given the location of the site so close to the M11, we contend that the site should be given serious consideration as a strategic employment allocation within the plan period.
10. On this basis, C J Pryor Ltd object to Policy P13 – ‘Rural Sites in the East of the District’ in that it does not go far enough in allocating a range of strategic employment sites over the plan period, and excludes the land at Harlow Gateway South site, despite the benefits arising from its strategic location.

Summary and Proposed Policy Amendments

11. We propose the following amendments:
 1. **Policy P13 be amended by the addition of a new employment allocation for B1, B2 and B8 uses:**

C (xx) RUR.E25 – Land at Harlow Gateway South – A414 London Road, Harlow
 2. **Policies Map 5.25 be amended accordingly.**



Epping Forest District Local Plan 2011 – 2033 (Regulation 19 Consultation)

Representations on behalf of C J Pryor Ltd

12. We would like to appear at the Examination in Public to explain the above objections when it convenes later in 2018.

PA/1498/sf
29 January 2018

