

## **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"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Andy"/>
Last Name	<input type="text"/>	<input type="text" value="Butcher"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Senior Associate Director"/>
Organisation (where relevant)	<input type="text" value="Countryside Properties"/>	<input type="text" value="Strutt &amp; Parker"/>
Address Line 1	<input type="text" value="REDACTED"/>	<input type="text" value="REDACTED"/>
Line 2	<input type="text" value="REDACTED"/>	<input type="text" value="REDACTED"/>
Line 3	<input type="text" value="REDACTED"/>	<input type="text" value="REDACTED"/>
Line 4	<input type="text"/>	<input type="text" value="REDACTED"/>
Post Code	<input type="text" value="REDACTED"/>	<input type="text" value="REDACTED"/>
Telephone Number	<input type="text"/>	<input type="text" value="REDACTED"/>
E-mail Address	<input type="text"/>	<input type="text" value="REDACTED"/>

## 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.

### Introduction

These representations on the Main Modifications (MM) to Epping Forest Local Plan Submission Version (LPSV) have been prepared by Strutt & Parker on behalf of Countryside Properties.

These representations on MM 26 and 27 are followed by further representations in respect of MM46 and 47, MM86 and MM87 set out in the accompanying Part B forms to this Part A form.

The representations set out Countryside's position on the MM, who have the principal land interests in relation to the North Weald Bassett residential site-specific allocations at NWB.R1 to R.5. They have control of NWB.R3, land south of Vicarage Lane, which is proposed for allocation for 728 homes, the largest of the 5 allocations at North Weald Bassett. Representations to support the allocation of NWB.R3 have been made throughout the Local Plan process, including Hearing Statements and appearance at the Local Plan Examination February to June 2019. Countryside's overall position is one of firm support for the LPSV. Prior to and since the Examination we have continued to work on a Masterplan for P6 in consultation with key stakeholders in accordance with the objectives of Policy P6.

#### Reasons for Representations – MM26 & 27

We note that the proposed amendments to the supporting text to Policy H1 at paragraph 3.4 (MM26) and Part A (v) of the policy (MM27) are to bring about a requirement that all new homes should be built to Category 2: Building Regulations Requirement M4 (2) Accessible and Adaptable Homes Dwellings standards, in order to maximise choice in the type, size and location of new homes available. Amended Paragraph 3.4 also notes that M4 (2) requires, amongst other things, step free access in non-lift serviced multi-storey development (i.e. above ground level).

The proposed modifications result, in part, from the Local Plan Inspector's question as to whether this optional technical housing standards is justified by the evidence as required by Planning Practice Guidance (Paragraph: 007 Reference ID: 56-007-20150327).

We consider that the modifications are not fully justified or consistent with national policy.

In their Hearing Statement to Matter 11, the Council referred to the evidence being found in the Strategic Market Housing Assessment 2015 which showed a projected increase in the number of people over the age of 65, together with consideration of the needs of wheelchair users and those with impaired mobility. In addition, the Statement indicated that "whilst not the primary purpose, a range of residents requiring enhanced accessibility (including those using prams/pushchairs; carrying luggage; delivery drivers; and tradespeople) would also benefit from the (optional) requirements of M4(2) to widen car parking space and provide level access into a dwelling, which are not regulated (parking), or guaranteed (level access), under the mandatory requirements of Category 1 of Part M4, concerning 'Visitable dwellings' ("M4(1)").

Having regard to the Inspector's question, we are not wholly convinced on the Council's justification that all new homes have to meet the M4(2) standard. The issue of the increasing aging population is of course a national trend and the evidence presented by the Council does not indicate that there are particular differences at Epping compared with other areas in the country that require the imposition of this higher bar standard to all new homes, particularly for enhanced accessibility, when M4 (1) should generally be sufficient to meet lifetime requirements.

The implications of the M4 (2) standard will be particularly relevant in the detailed design, layout and viability of housing that may be in excess of 2 storeys, as well as potentially resulting in decreased densities. This is likely to conflict with the aspirations of the Local Plan policies to generally secure higher densities on allocated sites.

We note the Home Builders Federation response on Matter 11 at the Examination. We support those comments and would agree with their conclusion that "the evidence indicates that some, but not all homes, should be built to Part M4 (2). This would provide sufficient scope to meet the need for such homes, whilst also ensuring development design and mix is not compromised by the demand for all homes to be built to the part M4(2)".

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.

In order to address the issues raised in this representation we would suggest that further consideration is given to the setting of a proportion of homes to meet the standard at both paragraph 3.4 and Policy H1. This could be defined as a baseline % requirement as a minimum of market and/or affordable housing to meet Building Regulations Requirement M4 (2).

*(Continue on a separate sheet if necessary)*

***Please note*** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. ***After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.***

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

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Yes

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No

Signature:

Date

23/09/2021