

Name:

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 and clearly print your name at the top of this form.

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 and Parker on behalf of Countryside Properties and are of particular relevance to the proposed residential allocation of land at North Weald Bassett under Policy P6 of the LPSV.

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.

Policy P6 also requires provision for a Traveller site, identified on Map X of ED131B and given the reference NWB.T1. within the policy. Countryside have no land interest in NWB.T1. However, it is noted that MM 86 as the supporting text to Policy P6 provides for an additional paragraph following 5.93 as follows:

"The site allocation is within the Strategic Masterplan Area and the precise location of, and access to, site NWB.T1 will be determined through the Strategic Masterplanning process."

We note that MM 86 also introduces a new subheading and paragraph to the supporting text at 5.99 providing for the approach to sustainable transport choices.

Reason for Representation – MM86

It is considered that additional paragraph following 5.93 is not positively prepared, effective or justified. It is noted that a reason for the change or a source of this element of the MM is not given. The approach to Strategic Masterplans (SMPs) is set out at paragraph 2.92 of the LPSV. It confirms that those covering areas of multiple land ownership, as is the case with P6, the SMP will, quite properly, be expected to have a "higher level overarching framework" to ensure planning and delivery in a coordinated way across the SMP area.

The requirement set out in the proposed modification for the precise location of, and access to NWB.T1 to be determined through the Strategic Masterplanning process is overtly prescriptive, unjustified and unnecessary against the background for the SMP set out at paragraph 2.92 of the LPSV and is better dealt with at planning application stage.

There are no objections to the introduction of the new heading and paragraph to the supporting text at 5.99 providing for the approach to sustainable transport choices. Indeed, the principles set out are being carried forward as part of the Strategic Masterplan that is being prepared by Countryside for P6. However the indication that "As well as the interventions identified more innovative sustainable solutions *will be sought* and the two Masterplan Areas should be considered together to develop co-ordinated sustainable transport proposals" is not considered to be effective or justified, being imprecise and unreasonable.

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 identified in this representation it is suggested that:

- The wording for additional paragraph 5.93 be amended as follows (change underlined):
The site allocation is within the Strategic Masterplan Area and the precise location of, and access to, site NWB.T1 will be determined through a future planning application.
- The relevant wording to supporting paragraph 5.99 is amended as follows (change underlined):
As well as the interventions identified more innovative sustainable solutions should be investigated and the two Masterplan Areas should be considered together to develop co-ordinated sustainable transport proposals.”

(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?

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Yes

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No

Signature:

Date

23/09/2021