

## **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="Steven"/>
Last Name	<input type="text"/>	<input type="text" value="Kosky"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Planning Director"/>
Organisation (where relevant)	<input type="text" value="Land Fund (Waltham Abbey)&lt;br/&gt;Ltd&lt;br/&gt;Ref: 19LAD0119"/>	<input type="text" value="Turley"/>
Address Line 1	<input type="text" value="C/O Agent"/>	<input type="text" value="REDACTED"/>
Line 2	<input type="text"/>	<input type="text" value="REDACTED"/>
Line 3	<input type="text"/>	<input type="text" value="REDACTED"/>
Line 4	<input type="text"/>	<input type="text" value="REDACTED"/>
Post Code	<input type="text"/>	<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.

Please refer to **Section 2** of the attached statement responding to the Schedule of Main Modifications to the Epping Forest District Local Plan Submission Version 2017 on behalf of LF (Waltham Abbey) Ltd – September 2021, prepared by Turley.

*(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.

The housing trajectory predicts a major step change in recovery from 2023, notwithstanding a further predicted fall in housing delivery for 2021/22 compared to the last monitored year (2020/21). The peak of this delivery is expected to take place as early as 2023/24, with a supply of over 1,240 new homes, which in practical terms means that all of these new homes must be fully consented (outline permission, S106 signed and reserved matters) all conditions discharged and all significantly under construction before the end of next year (14 months).

Given that only 149 of these homes are currently committed and have permission for the period 2023/24 and that the new Local Plan itself is not yet adopted, this unprecedented predicted 400% surge above that of the long term delivery average has little in the way of any credibility.

It is also clear that in the remaining six years of the Plan period, starting from as early as 2027, the Council will not be able to meet its annual housing requirement in five of those remaining six years. This is quite unacceptable for a 'new' Plan which is unlikely to be adopted before 2022 and which will only have a remaining shelf life of 11 years.

Our strongly held view is that the revised housing trajectory is not deliverable as currently proposed by these Modifications and needs to be augmented by the addition of further, alternative, smaller sites, as suggested by **Action 9** of the Inspector's 2019 letter to the Council (ED98).

Please refer to **Section 2** of the attached statement responding to the Schedule of Main Modifications to the Epping Forest District Local Plan Submission Version 2017 on behalf of LF (Waltham Abbey) Ltd – September 2021, prepared by Turley.

Enclosure

*(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:

PP: 

Date

23.09.2021