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Our ref: Planning Policy



**Neighbourhoods Directorate**

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Adriana Jones  
Clerk to MBL Parish Council

By email [mblparishcouncil@gmail.com](mailto:mblparishcouncil@gmail.com)

Dear Ms Jones,

**Epping Forest District Council response to Moreton Bobbingworth and the Lavers Neighbourhood Plan – Pre Submission Draft 2017-2035**

1. Thank you for your email sent on 14 December attaching the Draft Neighbourhood Plan under Regulation 14 of The Neighbourhood Planning (General) Regulations 2012. Thank you also for enabling an extension to the time that the Council has to respond from a deadline of 8 January 2018 to a deadline of 22 January 2018.
2. Having now reviewed the plan, I note that the matters relating to Policy MBL 1.1 previously of concern to the Council have been removed from the policy, and the Council therefore considers that Policy MBL 1.3 is in general conformity with the adopted Epping Forest District Local Plan 1998 and Local Plan Alterations 2006 and the Submission Version of the Epping Forest District Local Plan December 2017. I attach a copy of the Portfolio Holder report confirming this.

**Other EFDC recommendations**

3. The Council notes that the majority of the recommendations made by the Examiner relating to the 2016 version of the neighbourhood plan have been accommodated. We also note that the references to the current adopted Local Plan policy in Epping Forest District Local Plan 1998 and Local Plan Alterations 2006 have not been incorporated in the Plan. Given the current District Plan progress this seems a sensible approach. The recommendations below are those that the Council consider to be relevant to the findings of the examiner and I trust will assist with the clarity of the plan.

4. The examiner considered it prudent to include reference to the adopted Local Plan Policy (recommendation 7 and others). As noted above due to the timing of plan making this would not be an appropriate course of action at this stage. However, it would be valuable to include a reference to the current District Plan making position, not least to help to 'future proof' the neighbourhood plan. It is therefore suggested that you include the following at an appropriate point in the plan text – perhaps as an addition to paragraph A5 *“This plan has been produced in general conformity with the relevant strategic policies of the adopted Epping Forest District Local Plan 1998 and Local Plan Alterations 2006. In addition, the Submission Version of Epping Forest District Local Plan December 2017 has now been published under Regulation 19 and the Moreton, Bobbingworth and the Lavers Neighbourhood Plan 2017-2035 is also in general conformity with the strategic policies of that Plan.”*
5. It is also suggested that at paragraph A 55 the supporting text recommended by the examiner (or similar) is included i.e. *“Policies to encourage development of smaller dwellings are applicable but must allow for an element of flexibility for a limited number of larger dwellings to provide the flexibility and incentive that developers may require. The proposed limits on larger dwellings is based on the feedback from the residents’ survey”*. This was contained in the examiners recommendation 8.
6. The examiner sought a definition of 'local people' in MBL 1.2 (his recommendation 9) and the Council suggests that you use the same definition as that included in the Submission Version of the Epping Forest District Local Plan December 2017 at Policy H 3 (parts C & D). Rural Exceptions as follows: *“ C.....“Local resident’ is defined as : (i) Persons who have been permanently resident in the specified parish for at least two years; or (ii) Persons who are no longer resident in the specified parish but who have been resident there for at least three years during the last five years; or (iii) Persons who are in permanent employment in the specified parish and have been for a minimum of two years and are working at least an average of 24 hours per week; or (iv) Persons who have close relatives (i.e. parents, grandparents, children, brother or sister) living in the specified parish who have lived there for at least five years. D. Should there be insufficient applicants from the specified parish when the homes become available for occupation, then applicants from neighbouring parishes who comply with the eligibility criteria set out above will be considered”. It should be noted that the Council is currently consulting on a proposed change to this definition so it may be sensible to refer to the latest definition so that the latest one is applied.*
7. It would also be valuable to comply with the examiners concern (Recommendation 13) to provide a definition of the meaning of *“substantial, permanent and worthy of keeping”* in Policy MBL 1.3 Redundant Buildings. This would assist in the understanding of the intent of the policy. As noted by the examiner in referencing Policy GB8A 'permanent and substantial construction' would be *“capable of conversion without major or complete reconstruction”* (from Policy GB8A). It is suggested that the insertion of *‘therefore’* would make the policy easier to understand i.e. *“substantial, permanent and therefore worthy of keeping”* will provide a measure of the worthiness of the building as that being *“substantial”* and/ or *“permanent”*.

8. I trust that these recommendations are clear but please do not hesitate to contact me should you consider otherwise.

Yours sincerely

David Coleman  
Planning Policy Manager  
Epping Forest District Council