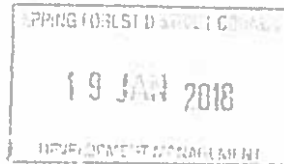




**Epping Forest
District Council**
www.eppingforestdc.gov.uk



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.efddocalplan.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)

December 2017

2. Personal Details

3. Agent's Details (if applicable)

Title	MR	
First Name	ROGER	
Last Name	LOWRY	
Job Title (where relevant)	-	
Organisation (where relevant)	-	
Address Line 1	[REDACTED]	
Line 2		
Line 3		
Line 4	[REDACTED]	
Post Code	[REDACTED]	
Telephone Number	[REDACTED]	
E-mail Address	[REDACTED]	

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

See document.

(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.

See doc.

(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.

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:

EPPING FOREST DC
19 JAN 2018

Responses to EFDC Local Plan 2017, referring to Epping town & to EFDC in general

The processes of consulting on both the Draft and this 2017 versions were flawed, lacking accessibility and openness. The data used in the latest Plan seems to have been used irregularly. The Plan is poorly formulated and incomplete. The implications of the Plan are heavily slanted to the negative, and in places defeat its stated Objectives. The developments planned are unsound, unsustainable and poorly reasoned.

1. The process lacked access & openness

a/ the last consultation process around the draft was unsatisfactory. I sent several emails to ldf (planning consultants), but only one was replied to – with the justification that they were overwhelmed. One of my responses did not feature on the published list; when I complained it was added, but after the closure date; so I had no indication whether the planners or Councillors had seen it,

b/ the present, 2017 document was published in late November with consultation only until late January – a short, very busy, holiday time

c/ the 2017 plan had almost no publicity – newspaper, fliers, leaflets, open meetings, which did happen for the draft. There seems to be no attempt to gather genuine opinion.

d/ the 2017 documents online were initially hard to find on EFDC website, it was difficult to decide which thread to follow, since documents from the previous process had not been cleared.

e/ the 2017 documents online were difficult to use eg the main report was at first 284Mb, difficult for older computers. After complaints, it has been released in smaller chunks, but this has limited the consultation period for some people.

f/ some documents online had so many links to other documents that it was unrealistic for citizens to wade through

g/ printed editions were few and far. When I asked in late December the council office had 2 only, which had to stay in the foyer, with no photocopying facilities

h/ I understand that one could order a printed copy – about a week lag, £20

i/ there was 1 copy in Epping library, with partial opening hours, no posters / notices

2. The process was poorly executed, executed, justified

a/ According to the responses to the draft, the majority of respondents were strongly opposed in general or specifically opposed to certain areas of the report. See data in - <http://rds.eppingforestdc.gov.uk/documents/s49377/C-006%20IO%20Responses%20Rpt.pdf>

Yet still the Council pushed ahead with the 2017 Plan. Insult was added to injury by them continuing to refer to it as "Your Plan". Nowhere does the 2017 version acknowledge that they are failing to comply with the expressed will of the residents!

b/ some sites had changed, between draft & 2017 eg Epping South is perhaps 20% larger with no explanation given. The public were consulted on one plan, but now the Council proposes a radically different plan.

c/ there was no satisfactory explanation of why some sites had been removed; or some towns' shares had been changed. For example, Theydon Bois has experienced a dramatic reduction in proposed new houses. When challenged the Council leader is reported to have said it was because of flood risk. Why was this assessment revised? Does flood risk change? It must cast it doubt all other judgments based on flood risk assessments! How confident can we be about the data used?

d/ I was told by a Councillor that one site had been removed because a third party planning consultant had successfully challenged the ARUP assessment. Yet these ARUP assessments remain as reliable data in the other sites?

e/ At the big Council meeting (14 December) to publish the 2017 plan, several Councillors raised concerns and suggested changes. They were told (pretty much verbatim) "you cannot change this plan". So what is the point of the present consultation? Is this a fair process?

f/ at the same meeting the "shotgun to the head" principal was explained – namely if Councillors don't vote for this plan, Westminster will impose a bigger number. So again- what point this consultation? And what has happened to the concept behind the Localism Act of 2011?

3. The plan is unsound (Epping town)

a/ the Plan talks of "housing our people for the future", and Councillor John Philip : "We need more homes for children of the District and our old people".. However elsewhere figures are given that imply the new housing is going to be mostly occupied by not local people. The report indicates that the local demand of around 200 a year across the district could be mostly accommodated by small scale, natural growth, increasing densities and infill. Epping is a small market town, not a sprawling commuter settlement. One of the Objectives of the Plan is to avoid overspill and urban sprawl from London. Fewer houses are needed..

b/ the Plan includes a large development called Epping South. There is no Master Plan yet developed for this area – so on what are we being asked to comment? This development is over a mile up quite a steep hill to the centre, few people will walk this – they will drive to the town centre or to other shopping areas. It is on an exposed open site, visible from some distance away. The local roads are all narrow residential or country lanes, already well-known for congestion and accidents; and they lead on onto main roads already clogged, eg I always need to queue for up to 10 minutes at the Ivy Chimneys traffic lights even at 10 pm.

Children of secondary school age in Epping South will be mostly attending Epping St John's School. This will entail a trip of almost 2 miles uphill, across the town centre. Few will walk, very few will cycle (narrow, busy roads, no cycle lanes anywhere in the town – already a safety concern). The

result will be more traffic on the school run, going up past the Tube station, already regularly jammed and tail-backed in the rush hour.

c/ Epping South is expected to have a "small retail area, a relocated primary school and a mini health hub", (no church or community hall?) and these will be paid for by the developers. That will be after they have sorted out water, power, sewage, drainage (a brook which floods for most of every winter; it is called Brook Road!), access roads and junctions, not forgetting the several enormous pylons and high-tension electricity wires which run over the site, and I am told some large underground oil / gas pipes! It is hard to see that a developer will afford all this; they will use the traditional defence of "we cannot afford it" and just build houses.

I regret to say that EFDC does not have a good record of ensuring compliance with these sorts of planning gain; as instances, look at The Arboretum, with its poor parking and drains, and King's Wood.

d/ Epping South is on Green Belt. I refer to the PM's recent statement, offering some protection to the GB.. "incursion only where absolutely necessary", including the phrase "but not in small market towns". The case of Guildford was raised in Parliament, where 50-odd% of new homes are planned in the Green Belt; our figure is over 70%.

b/ Epping Town's Infrastructure. Roads of all types are congested even beyond the rush hour. In the 1970's TV sitcom "Just Good Friends" a delay due to traffic in Epping became a national joke. Now the situation is much worse. Use of Google maps from 7am - 9pm will show especially how the South approaches to the town are red for slow / queuing traffic. Reports by Essex County Council DATA traffic unit have repeatedly said that local roads are nearing capacity, and some junctions are already well beyond capacity eg Bury Lane / High Road. Drivers of emergency vehicles already find the main road a trial - although none will admit that it puts lives at risk! Any Plan that will take traffic further over the threshold must be unsound.

The road situation is intimately mixed with the problem of Air Quality. Generally this is good, but there are two areas of concern - firstly the proposed Epping South (see b/ and c/) is next to a motorway. Secondly, the main road South of the town centre is recorded by the Conservators of Epping Forest as beyond acceptable, and an AQMA was in place in 2016 - at that point EFDC had no management plan in place; now they intend to deliberately worsen the situation.

c/ Epping Town's Infrastructure - rail. The terminus of the Central line is extremely busy in the two rush hours; there are occasions when almost vacant seats can be found, especially around 7:45am. South of about Woodford boarding passengers are forced to stand. Is it sound to exacerbate this? TfL have said they have no plans or investment to improve capacity on that line; even quoting implausibly low passenger / capacity percentages.

The Plan misses some possible solutions eg extending the tube line back to North Weald, or a park and ride system to service the tube station.

d/ Epping Town's Infrastructure - M11 & M25 motorways both run near to the town, but there is no immediate access. New traffic wanting access to the motorways will almost all have pass through the centre; alternately it will worsen the problem in the one or two existing "rat runs". District and national aims have all been to reduce the impacts of road transport.

e/ Epping Town's Infrastructure – despite what the Plan says, nurseries and primary schools are already oversubscribed, with parents being obliged to accept schools in other areas (eg known because I am a Governor at St Andrew's Primary in North Weald) – for which they have to drive. The Plan does not seek to increase the number of places in town, just relocate one school.

f/ Epping Town's Infrastructure – GP surgeries. The two practices in town have a patient shortfall in the order of thousands already (see IDP p39, 6.1.3), with long waits (typically up to 6 or 7 weeks) for appointments (see review sites). Adjacent villages have few medical services. Is it sound to add to that burden? Will a new "medical hub at Epping South" take up that overflow?

g/ Epping Town's existing sports & leisure facilities are very modest. The Sports Centre is small with no pool. For many forms of sport / leisure eg cinema, people are already driving to other towns. The Plan proposes to build on the SC; kindly in a recent meeting Councillors verbally agreed not to pull it down before a new site has been identified, but refused to promise it would be in town. An out of town site (North Weald airfield possibly?) will reduce access to sports facilities especially for the young, infirm and elderly, who do not drive - despite this being an Objective (D). Other users will be obliged to drive, again increasing traffic.

h/ Epping Town – car parking. The three parks in the town are often full, especially on Mondays. The station park is full by 7:30am and so the Council's agents have introduced widespread restrictions to stop commuters parking in residential streets. The Plan proposes no significant increase in parking numbers, despite an increase in population – surely not sound?

The Plan addresses car parking with three expensive and unsightly multistorey structures, with housing on top / adjacent. This may be reasonable in character at the Station, which is in a hollow: although this involves destroying an industrial / retail site and its employment (contrary to one of the Plan's Objectives).

However the other two car parks are on the edge of the town centre on rising ground – where multi-storey structures will be unsuited to the setting and character of a small market town. Again the finance for these structures – is to come from the developers; is this really financially viable? One also has to ask, where to park while these structures are being built – there is no mention in the Plan.

i/ the Infrastructure Development Plan (an appendix) lacks rigour, to the extent of not being a Plan at all, rather a statement of intent. Phrases like "We would seek to support.." abound.... yet sadly our district council has no power, little budget and a poor track record on the required scale of infrastructural improvements needed. For example, there are monthly curtailments to bus services, but the EFDC response is to "consult" with the companies, to no effect.

4. Plan unsound, implications from the EFDC area in general

a/ most of the thousands of proposed new residents in housing in North Weald, Thornwood and Hastingwood – will largely look to Epping as a conduit to work in South Essex or London. If they were to wish to work in places further North, they are likely to buy property further North too where house prices are lower. Whether they drive, or park and use public transport, there is only one Southward routeway, other than an extensive detour to the M11. This is already overburdened. I occasionally cannot avoid driving North to Harlow in the rush hour; there is more often than not a

traffic queue over a mile long coming South towards the Church Hill traffic lights, and through Epping. Deliberately planning to further overload this already over-capacity system has to be unsound.

Some of the new residents may consider using Harlow railway station as an alternative route Southwards. However the price differential makes this a minority likelihood. I currently am on nodding terms with two Harlow residents who park in the street where I live and then cycle down to the Tube station.

b/ our local hospital, St Margaret's is Out-Patients and geriatric only. The nearest general hospital is in Harlow centre, Princess Alexandra, to where there is some public transport. PAH already has massive issues with overcrowding and waiting times, a recent CQG inspection awarded it 5/9 red safety warnings, and in last December it was the very worst performing Trust for waiting times, out of 133 in England. The Plan suggests relocating PAH to the edge of Harlow – which might offer it more space but will have the side-effect of further increasing traffic.

c/ Affordable housing – it is pleasing to see the Plan specifies 40% as the ratio for affordable housing. Unfortunately in the past this has not been delivered, in 2017 EFDC was involved in building zero affordable housing. The most recent large development in Epping, the Arboretum, has a nominal small block of affordable homes, far below 40%. Developers seem to have strategies to defeat the Council's intentions.

5. The Plan is incomplete, having not considered alternatives

a/ The (as yet unpublished) details for the St John's Road site in Epping, presently indicate a tiny number of s; along with sundry other ideas of retail, cinema etc. This town centre site would surely accommodate a higher density of properties; in particular rising to more than two storeys. Perhaps the model of three floors of flats above shops, a traditional approach in a town centre. A possible argument against this is quashed by EFDC recently giving permission to a bulky 3-storey development on the High Road, just North of the petrol station.

b/ There are a number of housing areas throughout the EFDC which appear to be very low density. I have asked the Council for density figures, but have not been supplied yet. It would be more sound and sustainable to look to increase the density of some of those (where at least some infrastructure is already in place), rather than start new developments from scratch.

c/ There are over 1000 properties in the general area which have stood vacant for over 6 months, according to an article the Guardian newspaper (18th January 2018). District Councils have the EDMO capacity to take these into use; there is no mention of this in the Plan. It cannot be sound to build new properties when many are empty!

Mr R. K. Lowry 18 January 2018