

The Planning Policy Team,
Directorate of Neighbourhoods,
Epping Forest District
Council, Civic Offices,
323 High Street,
Epping,
Essex,
CM16 4BZ



29th January, 2018

Dear Sir or Madam

**Representation form for Submission Version of the Epping Forest District Local Plan 2011-2033
(Regulation 19 publication)**

As invited by The Planning Policy Team in their letter sent in December 2017, I am writing with my comments on the Local Plan and accompanying Infrastructure document. I have found it impossible to respond in the format requested online so am replying by letter instead.

This letter is from Adam and Frances Long at the address shown above, our email address is [REDACTED]. Adam Long would like to participate at the hearings as the issue involved are complex and cannot be stated succinctly in a written response and we wish to be notified when the Epping Forest District Local Plan is submitted for independent examination.

We have found it difficult to complete our appraisal of the proposals and to draft our responses in the short time available. The six-week consultation period was too short, especially because it included the Christmas and New Year period when your offices were closed and like many others we were away visiting family.

Appendices (B, C, E and F) referred to in the plan were not available even at the close of the consultation period making it hard to read the plan in full and make sense of it.

I have attached my comments as appendices to this letter and would ask if you would sign a copy of this letter as an acknowledgement of receipt today.

Your Sincerely

[REDACTED]
Adam Long

[REDACTED]

Frances Long

Received by Epping Forest District Council
29th January, 2017

Appendix 1 – General Comments

Comment to the plan in general

- The plan is not consistent with national policy
- Building on the green belt - Exceptional Circumstances have not been proven, the mere fact that housing is needed is not justification in itself.
- Exceptional circumstances need to be shown for each and every site.
- Failure to consider all other alternatives, specifically greater densification including in adjacent Local Planning Authority areas.

Failed duty to cooperate

- The Strategic Housing Market Assessment did not include all the ideal LPAs as Broxbourne pulled out.
- Cooperation should have included comparison of development densities in adjacent LPAs and the Strategic Housing Market Assessment numbers in order to decide where development should be intensified
- There was no consultation on garden villages as requested by numerous residents in replies to every consultation.
- The DCLA Minister's letter 21 July 2015 stated that "Each local planning authority should produce a Local Plan for its area, and in doing so should proactively engage a wide section of the community so that Local Plans, as far as possible, reflect a collective vision for areas." This has simply not happened since views of residents given to every consultation have not been taken into account and indeed have been totally contrary to views expressed by residents.

Not legally compliant

- Consultation with the public has not been meaningful.
- No consultation has been made on infrastructure because there was almost nothing included in the 2016 draft Local Plan
- Consultation under section 19 has been invalid in view of the failure to provide information on a timely manner, failure to advertise the project and omission of meaningful infrastructure commitments from other authorities.
- No Masterplan to support the Epping South or Gilston proposals

Not sustainable

- Infrastructure needed to support the plan has not been fully calculated, costed nor consulted upon with the relevant authorities such as TFL, Essex county council, Highways agency etc.

Lacks internal consistency

- Building multi-storey buildings near the town centre is not consistent with the market town image proclaimed as the objective for Epping (where stated).
- Large housing development on the edge of the town outside walking distance with no frequent bus service require more town centre parking which is not proposed

Statement of Community Involvement

The Council are meant to have involved the public closely at all stages. We believe they have failed because:

- Responses to previous consultations seem not to have had much effect on the later plans
- There has been no meaningful advertising of the current consultation
- Paper copies of the current Local Plan were not available to buy for home use until after the New Year break (so residents lost two out of six weeks)
- Copies which have been placed in libraries are not always on display and there is no advertising of them
- The published documents continue to exclude key information on the decisions taken and choices made by the Council

Appendix 2 –Comments on specific sites

Epping South

- Air quality may be expected to deteriorate with more homes and more traffic and an ever-busier motorway adjacent to the site in an area which already has air quality issues.
- Lack of Local and commuter transport leading to more car journeys which cannot be supported due to a lack of parking in Epping town centre.
- The development is unsustainable due to distance from essential services such as schools, shops, surgeries etc.
- There is a history of flooding in the local area.
- Road access is already stretched beyond capacity with unsatisfactory details of access for construction traffic nor how extra traffic will be accommodated once construction is completed.

Epping Laundry

- Not sound and not sustainable to convert employment site to residential within the town to which residents could currently walk or cycle.
- Proposed new employment sites require use of a car.
- Employment is already being lost in the town centre with the knock on effect to town centre shops as office space is lost every month due to permitted development conversion of offices to flats in the town and the resultant scarcity of offices.

Epping Sports Centre

- Proposal to use for housing without giving any proposal for a replacement sports centre is unacceptable and excludes community involvement.
- If EFDC plans to site a sports centre on the Green Belt, it would be unsustainable, lack community intimacy and amount to additional indirect Green Belt development.

Epping station car park

- No details given of alternative parking arrangements or park and ride arrangements whilst the site is being developed located in an area with over 500 spaces which are all full by 7am on a weekday morning.
- Developers to be required to make a financial contribution to access management at Epping Forest Special Areas of Conservation but not to improve pedestrian, bus and car access to the station.
- Proposal for retail at this site will further undermine the High Street. Other than improved café and newsagent facilities for travellers, this is not a welcome proposal and is unsustainable and unsound.

Epping Library

- The town has lost its Magistrate's Court, Police Station, schools have been built to the edges of the community and the sports centre is to be located away from the centre. The post office counter is in a retail shop and the parcel distribution is under threat of closure. Epping Hall is to close. The registry office is to close with the library. This is resulting in a town without a heart, creating unwanted car journeys meaning people have to leave the town for the most basic of amenities with the resulting impact to local retail businesses.
- If the library also goes, there will be no community facilities in the town centre (we understand a commitment has been given to create a new library "in the town" but that does not seem to necessarily mean the centre of the town).
- To lose this facility for so few homes is a poor bargain.
- We would lose the link proposed in the St Johns Road consultation to connect the High Street with the St Johns Road development. The only pedestrian link would be a narrow, poorly maintained pavement around St Johns Church next to a busy and ever busier junction.

St Johns Road

- Residential seems very low with the proposed development being based upon a consultation before the level of housing in the local plan for Epping was known which would have resulted in a very different response from residents. The opportunity for high density housing so close to the main town centre seems to be overlooked.
- The proposals are sketchy at best with no commitment from the proposed developer yet

Town centre car parks

- The scale of these proposed developments of flats above car parks could significantly alter the feel of our Market Town. It is not proposed to increase the number of shopper parking places. We would prefer to double capacity at one site and devote the other mainly to flats. The closure of the EFDC staff car park following its development into flats might give rise to additional competition for the few parking places and further undermine the shops and the historic market. The plan states that the current level of parking spaces will be maintained, this does not take into account parking for the residents in the flats nor the additional development south of Epping and resultant extra car journeys.