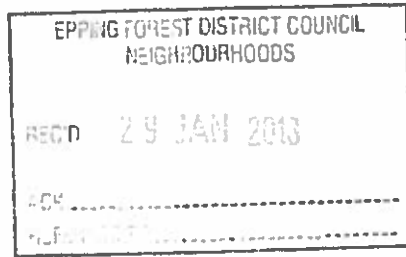




**Epping Forest  
District Council**  
www.eppingforestdc.gov.uk



**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.efdclocalplan.org/>

*- I couldn't find this to send in my version!*

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)

2. Personal Details

3. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>

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*2 Part B Submission included.*

**Part B**

4. To which part of the Submission Version of the Local Plan does this representation relate?

**Green Belt Policy**

5. I consider this part of the Submission Version of the Local Plan:

**Is not legally compliant**

6. Why I consider the Submission Version of the Local Plan is not legally compliant:

**I maintain that the Policy as set out in paras 2.133-7 does not justify the major developments on Green Belt land which are proposed. Curiously, there is apparently no cross reference between this section and Chapter 4 where Green Belt Policy is set out in DM4.**

2.135 National planning policy requires that exceptional circumstances are demonstrated to justify any alteration to the Green Belt boundary. - any justification must be *responsive to local conditions*.

2.136 The justification for altering the Green Belt boundaries in this plan arise from the local circumstances as they pertain to:

- The extent of the Green Belt and subsequent deficiency of land within the existing settlements to accommodate the *identified need*.

**In my opinion the *local conditions* in EFDC do not match with the *identified need*.**

1.22 Internal migration is projected to be the largest contributor of population growth as a result of the District's proximity and connections to London. Natural change has had a smaller but positive impact on population growth.

**Natural growth may be regarded as a local condition, which may warrant minor incursions into the Green Belt around existing settlements.**

**Providing additional homes within the Green Belt for migrants, moving towards London from elsewhere or moving out from London, is in direct conflict with the declared purpose of the Green Belt and should not be allowed to contribute to the *identified need*.**

**The proposed major developments, particularly around Epping, Ongar and North Weald, are not required by local conditions and so do not justify building on Green Belt land.**

7. Change(s) necessary to make the Submission Version of the Local Plan legally compliant:

**The target numbers of homes to be provided must be reduced to that required to allow for natural growth only, so that major developments on the green belt are not necessary. The case must be made that the district cannot provide the number of additional homes requested by the Government.**

8. **No, I do not wish to participate at the hearings.**

9. **N.A.**

10. Notification **YES**

11. Documents attached: **NO**

Signature:



Date: *28/1 Jan 2018*

## Part B

4. To which part of the Submission Version of the Local Plan does this representation relate?

### **The plan as a whole.**

5. I consider this part of the Submission Version of the Local Plan:

### **NOT SOUND**

6. Why I consider the Submission Version of the Local Plan is Unsound:

The documents seem to be totally lacking any overall strategy to maintain continuity of services and facilities, and to ensure that where new provision is necessary it is provided in good time. Road congestion and the associated air pollution are already serious local problems. Major developments at Epping, North Weald and Ongar, as well as those around Harlow, will increase the transport needs for people and goods. Rather than a strategic plan for development of the essential transport infrastructure, there seems to be some rather wishful thinking, and just a few road junction improvements.

Although the documents identify many infrastructure issues, nowhere is there any real indication of how these will be addressed. Para 6.3, p 182 states

“This chapter should be read in parallel with the District’s Infrastructure Delivery Plan which sets out the key infrastructure requirements to support the proposed growth for the District as identified in this Plan.”

The IDP does set out many infrastructure requirements in great detail, but is sadly lacking in commitment towards providing what is required, when it is required. Most alarmingly, in several areas upgrade of waste water infrastructure is rated critical, but with delivery phasing ‘unknown’.

The Strategic Masterplans para 2.88, p 34, each seem to exist in isolation. What is lacking is any clear indication of the road and other transport links which will be required to ensure that the ambitious aims of the overall plan are achieved if all these proposed developments take place.

Only in 6.13, p183, is there recognition that “Some infrastructure, for example improvements to the highways network, is likely to be strategic in nature and will support and enable the development of a number of sites.”

However, this is only in the context of funding.

Policy T2 Safeguarding of Routes and Facilities, and related paras 3.93-6, p 75, recognise the need for new roads etc, but are concerned only with principles and procedures.

Clearly both of these development areas will need access to the existing road network, but no details are provided. Improvements to several road junctions are listed, but rather alarmingly the major work on the M11 J7 roundabout is not scheduled until 2025. Ideally the North Weald Master Plan development would not have started before this work is completed. Still considering North Weald, NWB3 in the IDP mentions work “to improve access to rapid transit bus stops”. Where to? Via Special bus lanes, new roads?

Access for construction traffic to the South Epping site poses problems, even if a new access road is constructed at either end. The only approach is through Epping High Street if coming from M11/A414, or via B1393 through Epping Forest. Neither desirable. Should there be a completely new route, to the East of Epping, linking through to North Weald, the airfield Employment areas as well as the Master Plan Housing zone, and the A414?

Infrastructure and Delivery. Para 2.75, p 30, raises some issues which are not really addressed in Chapter 6, and the IDP actually confirms the shortcomings.

The delivery of key infrastructure will be vital to support the number of homes and jobs required over the Plan period. The sequential approach proposed for their delivery seeks to make the best use of existing infrastructure as well as providing the best possible opportunity to provide additional infrastructure capacity. The provision of infrastructure together with the timing of its delivery is considered in more detail in Chapter 6 of this Plan.

Para 6.2, p 182 The main focus of this chapter is the mechanisms by which the Council will ensure that the infrastructure required to underpin the plan will be delivered.

The IDP Part B Report (Infrastructure Delivery Schedule) lists many projects, even some rated essential, with the delivery phasing either unknown, or over such a long time scale as to be meaningless, whereas the Housing Delivery Strategy tables (appendix B p 151) suggest dates regardless.

I am concerned that while the 'sequential approach' making 'best use of existing infrastructure' may be fine for small scale developments, it is not appropriate for the Master Plan areas such as South Epping and North Weald. In these developments, which are intended to create new communities, the entire infrastructure package is essential, and must be completed over a short timescale once any homes are occupied. The first occupants should not be left for years, living on a building site, awaiting promised facilities. The proposed phasing over ten years from 2022 is highly undesirable.

With these two major developments delayed, the proposals show some 400 homes in Epping, Theydon and North Weald, and a further 180 in Ongar by 2022. This is far more than the existing facilities, particularly schools and GPs, can accommodate. There is already a strain on medical services locally, and new provision is rated essential. The Master Plans included provision for Medical centres and Primary schools. Surely priority should be given to starting on one of the Master Plan schemes to provide the facilities as soon as possible.

A controversial proposal, which has potential impact for many current residents across the district, is the plan to build on LT Station car parks. We are assured that, when completed, there will be the same amount of parking space, but nothing is said about the provision for commuters during the construction period. Present capacity is inadequate. Any even temporary closure would create problems, most severely in the case of the largest carpark, at Epping. Ideally this should have been considered only after agreement had been reached for The Ongar Railway to run commuter trains in to Epping. However, the Housing Delivery Strategy suggests that this site will developed will be developed in 2020-22, concurrently with work on the Station Car Parks at Theydon Bois, Debden and Loughton I Is this really planning ?

Two final points, relating specifically to Epping, arising from the Housing Delivery Strategy. The first site in Epping to be developed is EPP.R11, Epping Library. There does not appear to be provision for a replacement before this work starts. Epping Sports Centre EPP.R5 will apparently go in 2022, again with no replacement provided in the town.

Despite all the man hours and money spent on the project this final plan is not satisfactory. The only sensible conclusion from all the accumulated evidence would have been that the arbitrarily imposed Government target was totally unrealistic.

7. Change(s) necessary to make the Submission Version of the Local Plan Sound:

Probably impossible without scaling down the number of homes to be provided, and modifying the sequencing of building on car parks and existing amenity sites. Even then, much more detail of strategic road and transport plans, and a positive commitment to the timely provision of the many other facilities listed so exhaustively in the IDP.

8. No, I do not wish to participate at the hearings.

9. N.A.

10. Notification YES

11. Documents attached: NO

Signature:



Date: 28/11/2018