

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

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) Resident

2. Personal Details

3. Agent's Details (if applicable)

Title **Ms**

First Name Judith

Last Name Lunn

Job Title
(where relevant)

Organisation (where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address

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	The entire Epping Forest Local Plan, Submission Version 2017, but with particular reference to Epping Town	Policy	Various Policies referred to in the Epping Forest Local Plan, Submission Version 2017, but with particular reference to the Epping Town	Policies Map	Various Maps referred to in the Epping Forest Local Plan, Submission Version 2017, but with particular reference to the Epping Town
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Site Reference	As above	Settlement	As above
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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 No b) Sound No

If no, then which of the soundness test(s) does it fail*

Positively prepared	No. It has failed to take into account the consultation of 2012 and response to the 2016 plan.	Effective	No. It is not deliverable or sustainable.
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Justified	NO	Consistent with national policy	NO
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c) Complies with the duty to co-operate 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

The plan is not legally compliant -

The plan is not consistent with national policy re the Green Belt. I question the need for such a huge number of new dwellings in the boroughs adjacent to or close by the M11 corridor. The figures were based on SHMA which was a joint project between Broxbourne, Epping Forest, Uttlesford and Harlow LPAs to determine the need for housing in this area. Broxbourne pulled out of this process so SHMA is a flawed and inadequate study. It is impossible for any body/organisation to predict need on this data. It is impossible for this to be used as "exceptional circumstances" for all the Green belt sites threatened by this plan.

Also, The National Planning Policy Framework (NPPF) requires that:
"For a plan to be justified, it should be "the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence".

This plan is clearly not the most appropriate as –
- Not all alternatives have been fully explored

- It is based on flawed and insecure evidence

I have been unable to find the evidence on which other “reasonable alternatives” have been summarily dismissed from the Plan by EFDC.

As a member of the Epping Society, I was very interested in the public consultation during 2016. During this period, I looked closely at the evidence from the ARUP survey. I do not believe this evidence is sound. Here are just a few examples -

- None of the sites identified scored adversely on transport related criteria. All residents who responded to the Society disagreed as we all know that Epping and its surrounding roads are a natural bottleneck at any time of the day, let alone peak times.
- How on earth could Epping Station score positively for “access to the site”!!!
- A single category was tested for “Level of harm to the Green Belt.” It is hard to understand how any Green Belt sites should merit a positive score?

The plan is not legally compliant as it has not considered the views of the local population. As the DCLA Minister stated in his letter of 21 July 2015, “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 reflect a collective vision for areas.”

The EFDC falls considerably short of this.

During the consultation period, residents throughout the District found that the level of housing was too high. This has been completely ignored and dismissed. The vision of proposed development by EFDC was rejected when 81% of residents thought the vision wrong.

During 2016, The Epping Society carried out its own survey and held a number of meetings to listen to the residents. From our responses there was little belief in the sites that have eventually been selected for the local plan. Only 22% of our respondents thought that the use of the public car parks was favourable. There were even fewer residents in favour Epping Station car park and only 9% favoured Epping South.

Residents have never been given the opportunity to consider –

- The increase in size of South Epping (increased from 469 to 950)
- The use of North Weald Golf Club or other possible golf courses such as Nazeing
- The Latton Green or Water Lane proposals
- The Gilston development (not in our District but will certainly impact)
- East of Harlow development
- All of the above sites are within 3 miles of Epping and will naturally impact on the town and the rest of the District
- The viability of a complete new village in the District close to the A414 and M11
- The impact of any increase in infrastructure

In other words the residents have not been given any meaningful opportunity to reflect and consider all possibilities and any alternatives.

The plan is unsustainable –

There is no infrastructure plan worthy of that name and no plan for its delivery. There are no commitments to dates or financing. There is no indication of what the infrastructure may include apart from a reference to rebuilding of 1 primary school that will have to be built on Green Belt. The secondary school in Epping is currently full and to expand it will have to build on Green Belt.

There is no detail of where any new roads or other infrastructure will be placed.

It is impossible to build the required new roads to carry the increased traffic without encroaching on Epping Forest. Even to improve some of the relevant road junctions will impact negatively on Epping Forest eg Bell Common traffic lights (access to South Epping), Wake Arms roundabout (access to the M25 and M11), traffic lights at north Epping. All in Epping Forest, a protected forest.

The plan does indicate that we lose our Sports Centre. The town is being increased in size yet there is no guarantee of any sports provision in the plan!

Parking is a key problem for this District. At present, there is insufficient parking for our local shoppers who are still keen to come to our town centres.

There is insufficient parking for those who work in the town.

There is insufficient parking for commuters who drive into the EFDC area from all over Essex to make use of the reduced cost of travel on the underground. It is all very well talking about increased capacity on the underground but where are these passengers going to park as they come in from the Latton Park, Water Lane, Thornwood developments let alone other districts in Essex. Epping Station is full by 7.00. Commuters park anywhere they can resulting in clogged streets all over the district. The District has some residential permits but this is very adhoc and expensive.

There is no planned solution to the current parking problem in the District. There is no planned solution to the increase of these problems within the Plan making it unsustainable.

In fact, the plan is adding to these problems and not just by increased numbers of residents and commuters but by DECREASING THE PARKING READILY AVAILABLE. The proposals to build over car parks, both station and other public car parks, throughout the district are clearly unsustainable. Even with the proposed underground parking, it is highly likely that the parking provision will in reality be reduced in this District.

The plan for Epping also includes the loss of parking currently designated for those who work in the town (sites Epp.E3 and Epp.R10. Where are they expected to park?

The plan does not protect the character and nature of Epping as a historical market town. With the proposals to build so much close to the centre of town, thereby decreasing the parking facilities and increasing the already high density of population results in a town that has no community centre and exists purely as a dormitory town for London. Building multi-storey buildings is not consistent with the market town image as the declared objective for Epping.

The plan is not effective due to these proposed sites being included –

Cottis Lane Car Park (EPP.R6) and Bakers Lane Car Park (EPP.R7) Unsustainable

The scale of these proposed developments of flats above car parks will significantly alter the feel of our Market Town. It is not proposed to increase the number of shopper parking places.

The closure of the EFDC staff car park (Epp.R8) will give rise to additional competition for the few parking places.

It is wrong that workers' car parking spaces currently provided at Epping Library site and at the EFDC offices site

will not be replaced elsewhere. Staff at town centre retail and other businesses already find it difficult to park partly because commuters fill any spaces.

Site Epp.R7 the town has lost it's Magistrates Court, Police Station and will lose its local community centre based at Epping Hall as well as its library and registry office. The plan only offers an "alternative library provision."

Site Epp.R5- I understand the replacement the current Sports Centre but there is no concrete commitment to a replacement. Unsustainable

Epping Underground Station Epp.R3 Unsustainable – No provision for improved access for pedestrians, cycles, buses or cars!! No guarantee of improved parking provision even though this will be required. Proposed retail that will undermine our town centre.

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.

Reduce the number of new dwellings – in Epping alone the housing stock is being increased by approximately 25%. According to the Council Tax Team from EFDC there are currently 5,514 dwellings in the town of Epping. (as of 15 January 2018). This is to be increased by 1300 new dwellings. This is a 25% increase!

Do more to protect the character of Epping – Consider other sites eg North Weald Golf Course – already closed and next to main roads including easy access to M11. No Councillor has been able to explain why this site has not been included. This would remove the need of ripping the heart out of our small market town with multi storey car parks and blocks of flats right in the centre of the town.

There are two very obvious, large sites that exist and are available. They are more appropriate, sustainable, and economically viable, but currently **not** in the Local Plan. These are namely land by Theydon Bois and North Weald Golf Course - sites that currently have land owners/developers interested and keen to build.

Theydon Bois has been allocated just 58 houses in the Local Plan and could easily take 500 houses. All within walking distance of the its tube station.

Increase density of population in other areas – the current population density of EFDC is almost 13,000 per square mile. Harlow has a density of about 7,000 psm. In England overall, the density is 1,200 psm. To achieve higher density, the plan could zone areas of relatively low density (and poor quality housing stock) for systematic redevelopment over the period of the plan.

The concept of a new “garden village” has been discussed by local residents but EFDC has given no reason why this could not be considered. This is hard to understand when there is a viable site within easy reach of the M11 at the new 7a junction.

Unsustainability – car parking has to be a more prominent feature of the plan with a well formulated plan including –

- Increased parking for shoppers, workers and commuters
- New and imaginative ideas for improving bus routes to and from our town centres and underground stations
- A unified approach to residential permit parking
- More liaison with TfL

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

9. If you wish to participate at the hearings, please outline why you consider this to be necessary:

Yes / No

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

11. Have you attached any documents with this representation?

No

Signature: Judith M. Lunn

Date: 27 January 2018