

Local Plan Representation: Representation on Submission Version of the Epping Forest District Local Plan 2011-2033

Part A: Already completed online, but for confirmation: Resident and member of the public :: Henry Stamp ::

Part B *

Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination * **YES** ~~No~~

Signature (type name) * Henry Stamp Date * 27/1/18 XXXX

Representation Number * HS 3

To which part of the Submission Version of the Epping Forest District Local Plan does this representation relate?

Paragraph

Policy P1

Policies Map Yes regarding site allocations

Site Reference EPP.R9 and EPP.R8

Settlement EPPING

Do you consider this part of the Submission Version of the Local Plan to be:

Legally compliant? *

Yes No Don't Know

Sound? *

Yes No Don't Know

Complies with the duty to co-operate? *

Yes No Don't Know

*Please give details either 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; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible. Please use this box to set out your comments. * Please attach any supporting documents Drop files here to upload -Accepted file types: .doc, .docx, .jpeg, .jpg, .jpe, .pdf, .tiff, .tif*Uploaded: 0/10

The Plan allocates sites for some 1,305 new homes in Epping, while not allocating additional sites for employment (the

general text about more intensive redevelopment of employment sites doesn't apply to any significant extent for Epping given the nature of its employment sites, e.g. Falconry Court is recent and very intensive).

The Plan does allocate new employment sites mainly at North Weald Bassett and Waltham Abbey. For new Epping residents on allocated housing sites, travelling to work will mainly be via private car adding to pollution and congestion: through the High Street and Epping Forest to North Weald; and particularly through Epping Forest SAC to Waltham Abbey. To be sustainable the plan should aim for a jobs:workers balance in the town, particularly as it is one of the most significant in the District and has the highest new homes allocation in the Plan. The jobs:workers balance seems to be an overall aim of the Plan in terms of new homes and job numbers: but this hasn't been applied to local areas/towns. While it may be the case that some current residents commute out of the District to work and that some workers employed in the District commute in from homes outside it; nevertheless it makes long-term sustainability sense to make provision for a balance of employment premises and homes in the District, to reduce the NEED to travel. This is accepted wisdom. Also, as travel routes are likely to become more congested, and the costs of travel if anything also to increase (both financial and environmental) planning for this future will make the District's residents better off.

Sites EPP.R9 and EPP R.8 are sites where employment would be more appropriate for employment than for housing and would help even up the jobs:workers ratio.

Bower Vale, EPP.R9 is/has been in employment use and it could be redeveloped more intensively depending on demand. It currently borders relatively few residential properties, while developing the site for housing is likely to create more residences close to the longer boundary of the allocated employment to the south (EPP.E4), so any problems arising from housing next to employment use would be made worse. At the very least EPP.R9 could be a good site for various live-work opportunities (e.g. small workplaces attached to homes where perhaps a firm could grow to take on an employee or two, perhaps office based businesses or workshop/craft industry). The plan recognises the need for start-up and grow-on space: this site whether through small (perhaps sub-divided existing) units or live-work premises could contribute to meeting that need.

The part of the existing Civic Office that is EPP.R8 is an existing office use, and the number of workers the current buildings can accommodate contribute to the health of Epping town centre through their spending on local goods and services, as anecdotal evidence shows. The loss of relatively modern, purpose-built, space for so many jobs will be significant in terms of the town's employment. The use of this floorspace retained for employment would accommodate new jobs, e.g. for business that could move out of London (given proximity to the Underground service) and provide local employment for occupiers of some of the 1,305 new homes, or existing town residents who could then walk or cycle to work. The Great Crested newt population on the site is least likely to be affected by office use continuing (compared to housing) and I understand that the implication of moving newts elsewhere is unacceptable. Also I understand that the most recent Civic Offices buildings, part of which are on site EPP.R8, are now listed buildings, partly due to their internal features such as wood panelling and fittings. Continued use for employment purposes would best fit with the listed building, unlike housing.

It is of course open to the buildings' owner to use permitted development rights to convert offices to housing. But I don't think that is likely due to the nature and scale of the building (particularly for the listed parts which would still require Listed Building Consent). Even so, the ability to use permitted development rights doesn't mean that allocating the site for employment (as the Plan does for other employment sites like Falconry Court which could likewise be converted to

housing) isn't the right thing to do in planning terms.

There will be some implications in allocating these 2 sites for employment for housing numbers (although slightly less impact if Bower Vale were for mixed use live-work). If both sites were allocated for employment with no housing, the number of units on allocated sites for Epping would drop to 1,211. Density figures for Epping housing sites are given in very precise numbers, e.g. 83 dwellings per hectare (for the station car park site), not round figures like 80 or 90. It would only take a 7.7% increase in density for other Epping housing sites to make the 1,211 figure back up to 1,305. Also, it may be that parts of other allocated new employment sites (as at Waltham Abbey or North Weald Bassett) or newly allocated existing employment sites might benefit from some housing, e.g. at the edges to cross-subsidise premises' renewal or provide live-work space. Particularly where this would improve the jobs:workers balance for the settlement under the Plan.

In not meeting employment needs, where they need to be met, I consider the Plan is not Positively Prepared in this respect, nor is it justified given the reasonable alternative set out. Also it isn't consistent with delivering sustainable development.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? * YES

YES, I wish to participate at the oral part of the oral examination

*If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary: **

To find out and assess what EFDC proposes to do about the issues/concerns raised in this objection; and question their responses as necessary.