



**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/>

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	MR	
First Name	DANIEL	
Last Name	KING	
Job Title (where relevant)	N/A	
Organisation (where relevant)	N/A	
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	[REDACTED]	
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

Policy SP7 (pages 51/52) demonstrates a strong commitment to not just conserve but ENHANCE biodiversity.
Policy for Epping (P1 page 116/117) that sets out in Point ix a clear commitment "to minimising the impact upon the BAP priority habitat within the site and nearby local wildlife site" This a contradictory Policy to SP7.

(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.

Commission an independent ecological assessment. I don't believe the EIA as it currently is presented has considered the development on the local wildlife habitat which includes Bats (type unqualified to answer) Birds of Prey, Sparrow hawks, Kestrels, + Buzzards* (* Buzzards have returned to Essex recently after a 50yr absence.)
- Commission a survey to establish the location in South EPPING, behind 109 Chimneys is a site of importance for Nature conservation.

I remain keen to ensure the natural environment is maintained to ensure local bio-diversity is allowed to flourish.

(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:

I dont feel adequate representation on the environmental and nature/ wildlife has been considered with any importance, I would be Keen to ensure these views are considered.

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

i.i. Have you attached any documents with this representation?

Yes

No

Signature:

Date:

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The Greenbelt Land identified in the plan ready for submission, in particular reference the "Sout EPPING Master Plan", in particular the land behind Ivy Chimneys, Bridge Hill and Brook road does NOT comply with NPPF Section 9, Paragraph 88 as underpinned by Paragraph's 79 and 80. The local authority (EFDC) have NOT shown ~~compliance~~ compliance with Paragraph 88 'very Special Circumstances'.
Please see continuation

(Continue on a separate sheet if necessary)

Continuation to Section 6 Part B.

The Proposal for some 950 dwellings in the Proposed location defined in the "South Epping Master Plan" has a clear detrimental impact on complying with the Preservation of Openness the density ~~proposal~~ of the Proposal will clearly cause significant harm to Openness and can't be classified any other way.

END

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1 Suggest EFDC review existing density, review locations in adjacent local planning authority areas, which comply ^{better} with a range of tests.

- Continue engagement with local community and key stakeholders, organisations representing a good mix of interested parties.
- Take on board through a critical review of responses to the 2012 and 2016 responses to the draft local plan, which have not been considered here in the plan ready for submission in its current state.

(Continue on a separate sheet if necessary)

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I or a qualified person of invested interest should be able to represent preservation of Green belt issues as the LA - EFDC seem to be unaware of the NPPA - Sec 9 Protecting Green Belt Land.

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Signature:



Date:

28/01/18

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The strategic Housing market Assessment did not include all the LPA'S.
⇒ No comparison of development densities in adjacent LPA'S in order to decide where development should be intensified.
⇒ No Consultation on Garden villages guidance.
⇒

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EFDC Should:

- ⇒ Review all alternative locations and sites
- ⇒ ensure engagement with all LPA'S and are included in the planning considerations.
- ⇒ Ensure timely consultation with local community.

(Continue on a separate sheet if necessary)

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I don't consider necessary attendance on this matter

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Yes

No

ii. Have you attached any documents with this representation?

Yes

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Signature:



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⇒ very little infrastructure information was included on the 2016 draft Plan.
⇒ No consultation on infrastructure
⇒ public consultation has not been meaningful
⇒ Plan was published on the 18th December, the Plan was not well advertised in LA Locations and the written documents were not available until into the new year delaying period by 2 weeks with no extension.
⇒ draft Plan did not include meaningful and necessary detail on infrastructure commitments from other authorities and organisations

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- ⇒ Provide detailed infrastructure plans and feasibility studies by independent verified organisations
- ⇒ Consider the impact on the plan and incorporate in current thinking.
- ⇒ Consider all previous responses and factor them into a re-drafted plan for submission
- ⇒ Publish as an addendum key information on the decisions taken and the choices made by the Council.
- ⇒ In general terms the Council need to engage ~~and~~ actively a good cross section of the community openly and honestly.

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I would like to understand the
funded infrastructure that underpins the whole
South Epping master plan and is not available
- Surely this is not viable.

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I believe the 'South EPPING master plan' has a number of failed and flawed areas:
⇒ The proposed development site of Ivy chimneys, Bridge hill and Brook street will increase the traffic on already congested roads with no planned approach to ease congestion or identify meaningful access/egress to the proposed locations especially in Ivy chimneys and Bridge Hill
⇒ NO sound air quality testing as location in Ivy chimneys is proposed to border the M25 boundary fence - some 2 meters from the hard shoulder.
(Continue on a separate sheet if necessary) Please See Sheet

Continuous Sheet

- ⇒ the South Epping location is does not meet any reasonable considerations based on walking or cycling to amenities over 1.3 miles from proposed development site and will promote vehicle use
- ⇒ Permitted development conversion of office space to residential questions the viability of promoting local jobs for local people.
- ⇒ land at rear of Ivy chimney, Bridge hill and Brook Street is
- 1) Prone to flooding
 - 2) a bio-diverse site
 - 3) Potentially unstable ground with no supporting Survey
 - 4) houses flood drainage culvert to support drainage but still floods.
 - 5) over 1000 meters to nearest sewer system with no evidence of its suitability to manage an increased capacity that's being proposed.
 - 6) failed to consider an oil/fuel line that runs across the site
 - 7) No consideration for the electrical Pylon ~~Post~~ and high tension lines placed on the brow of the hill
- ⇒ No Sound Proposal to replace Epping Sports Centre
- ⇒ EFDC approach to multi-storey parking is not in keeping with Market town
- ⇒ little reference given to parking displacement over car park closures on remaining facilities and no financial impact assessment of not being able to access local shops/cates/restaurants.

END

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Due to lack of engagement and consultation and a failure to ~~to~~ include comments, organisations and groups has left the alternative best to wholesale change the plan -
Considering all the points raised and having an appetite to address and resolve, incorporate and be prepared to listen.

(Continue on a separate sheet if necessary)

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

A large number of gaps need to be brought into the plan to make the plan viable unfortunately as Confessed by a Serving Councillor EFDC drafted something for Submission to avoid falling foul of the Secretary for State and having the allocation of housing / dwellings doubted. I don't feel the LA have only considered the viability of the plan for Submission and I would like to do that - I don't have all the answers - but I am not Paid for that - to test viability

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