

XX Attachment follows page 3 XX



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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	NICK	
Last Name	AGNEW	
Job Title (where relevant)	[REDACTED]	
Organisation (where relevant)	[REDACTED]	
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3		
Line 4		
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

Having looked at the 'Epping Forest District Local Plan, Submission Version 2017' and the details contained in 'Appendix 6' containing area deleted development plans, I believe that the statement included in 'Transport Statement' – "A simplified version of a transport assessment where it is agreed the transport issues arising out of development proposals are limited and a full transport assessment is not required" is incorrect and the claim unjustified by evidence, including:

- 'infrastructure' requirements to meet future demand e.g. future Central line service provision proposals by TfL (2025/+256)
- current 'peak of peak' evidence of local 'against the flow' journeys to gain a seat for main journey indicates peak capacity, including impact on rest of line, is understain.

(Continue on a separate sheet if necessary)

(continued)

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.

Assurance must be given that before any development approval is given, relevant policy documents identified for update will be produced and evidence given of their effectiveness.

At present, the document/proposals include references to facts that may enable developers and other parties to control car ownership/parking for residents of any new dwellings where no evidence exists that this can/will be enforced!

Other references need strengthening. An example on P115/6 (Epping) is ".... any potential harm... can be suitably mitigated..." (without suggesting how). Adding text such as ".... such as "rigid parking controls and enforcement extending from the station into new development areas" after the text ".... incorporation of sensitive design measures" will be an example.

(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

I ~~am~~ willing to discuss my concerns with EFDC Planning officers.

December 2017

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

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

11. Have you attached any documents with this representation?

Yes No

Signature:



Date:

28 JAN 2018

EPDC Local Plan representation

6 - continued from p 3

- The 'Transport' section of the local plan (Para 71-75) refers to pressure on road space, (in)ability to achieve acceptable modal choice switch now and implicitly/explicitly in the future from car to bus, rail or other modes that can absorb additional demand, together with issues such as (para 3.84 "The District, as in many other places, has an ageing population where the car will, over time, become less feasible as a method of travel"). Aspirations to deter car ownership from some (many?) residential development sites that are proposed, eg. on LUL station car parks at Epping, Theydon Bow, Debden, Loughton and Buckhurst Hill, are aspirational and concerns remain by evidence-based research identified in para 3.85/page 72 "that many households will still want to have access to a car." I suggest this will be of particular concern in large-scale proposed developments such as nearby Harlow and Gilston Garden Town, where residents in areas such as Latten Priority will wish to commute via nearby Epping, using hard-pressed peak corridors, for reasons of economy, frequency of train service etc, as identified elsewhere in the report.