

Stakeholder Reference:

Document Reference:

---

## Part A

---

### Making representation as Statutory Consultee, Local Authority or Town and Parish Council

Personal Details		Agent's Details (if applicable)
Title	Mrs	
First Name	Janet	
Last Name	Ballard	
Job Title (where relevant)	Clerk	
Organisation (where relevant)	Roydon Parish Council	
Address	P O Box 10752 Hatfield Heath, Bishops Stortford	, ,
Post Code		
Telephone Number	01279 730475	
E-mail Address	roydon.council@btinternet.com	

---

**Part B**

---

**REPRESENTATION**

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

Paragraph: 5.174

Policy: P 14 Rural sites in the west of the District

Policies Map: Yes

Site Reference: RUR.T1

Settlement: Rural - West

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

Legally compliant: Don't Know

Sound: No

If no, then which of the soundness test(s) does it fail? Justified, Consistent with national policy

Complies with the duty to co-operate? 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.**

## Sites for Traveller Accommodation

The draft plan incorrectly states that there are no traveller/gypsy site allocations in Roydon (paragraph 5.128). This is incorrect as three are proposed for the parish – RUR T1 (Sons Nursery x 2) and RUR T2 (Ashview) both in Roydon Hamlet with a further two sites (9 pitches) just outside the parish boundary. No justification is given for RUR T1 & T2 other than the approach stated in paragraph 2.69 which places the existence of temporary permissions for existing sites as one of the first approval criterion for permanent sites. In the document 'Traveller Site Selection Methodology' (Arup 2017) EFDC is advised to continue the approach of 'regularising' pitches, and refers to the DCLG's Planning Practice Guidance. This guidance sets out a sequential approach which places sites with existing planning permissions and sites where planning has been refused or withdrawn, high on the list for consideration. However it should be noted that the DCLG's guidance also requires plan makers to identify as wide a range of sites, as possible, but in broad locations. We therefore consider that EFDC has been too ready to use the existence of temporary planning permissions as the sole criteria for selection within the draft plan. The Planning Inspector granted temporary permission on RUR T1 & RUR T2 as a result of 'personal circumstances' but he gave considerable weight to MGB harm and determined that RUR T1 should be returned to its natural condition upon expiry of the temporary permission – it seems clear that without these personal circumstances, temporary permission would not have been granted. It should also be noted that conditions applied to both of these permissions have not been complied two years after temporary permission was granted. We therefore contend that the allocation of G & T sites in Roydon Hamlet is not consistent with national policy for the above reason and for these further reasons:-

- the sites are in the Green Belt. National policy, as set out in the Planning Policy for Traveller Sites (PPTS), clearly states that inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances; and that traveller sites are such inappropriate development.
- the Hamlet Hill sites have already given rise to difficulties and concerns among local residents who feel that there is already excessive traveller accommodation in that area, whether official or otherwise. The PPTS requires local planning authorities to ensure that traveller site policies "promote peaceful and integrated co-existence between the site and the local community"; the proposed allocations, by over-concentrating traveller sites in Roydon and neighbouring Nazeing, contravene this requirement. Roydon already has over 65 pitches (an increase of 15 since the Essex Gypsy/Traveller/Showpeople Accommodation Assessment (2014) was carried out by the Essex Planning Officers Association. We note that it is proposed that up to five more traveller sites should be located in the Water Lane area, which would make the over-concentration of sites in this area even more marked.
- the PPTS requires authorities to promote access for travellers to health services, and to ensure that children can attend school on a regular basis. Over-concentration of sites in one area risks imposing undue strain on services and resulting in non-compliance with these vital requirements  
We therefore contend that the allocation of two permanent traveller sites in the Parish of Roydon is not the most appropriate strategy and no evidence is supplied to demonstrate that the choice is proportionate when considered against reasonable alternatives.

There are also inconsistencies with national policy. The Parish Council believes that the draft plan is unsound in this respect.

**Please set out what change(s) you consider necessary to make the Pre Submission 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 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.**

Removal of the sites from the plan and allocation elsewhere in the district to provide a fairer spread of sites and mitigation of problems outlined. We would also like to see firmer action being taken against illegal sites and it should be noted that a distinction between gypsies and travellers should be made as, in general, they will not live together.

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

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 reinforce the Parish Council's views

## REPRESENTATION

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

Paragraph: 5.174

Policy: P 14 Rural sites in the west of the District

Policies Map: Yes

Site Reference: RUR.T2

Settlement: Rural - West

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

Legally compliant: Don't Know

Sound: No

If no, then which of the soundness test(s) does it fail? Justified, Consistent with national policy

Complies with the duty to co-operate? 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.**

The draft plan incorrectly states that there are no traveller/gypsy site allocations in Roydon (paragraph 5.128). This is incorrect as three are proposed for the parish – RUR T1 (Sons Nursery x 2) and RUR T2 (Ashview) both in Roydon Hamlet with a further two sites (9 pitches) just outside the parish boundary. No justification is given for RUR T1 & T2 other than the approach stated in paragraph 2.69 which places the existence of temporary permissions for existing sites as one of the first approval criterion for permanent sites. In the document 'Traveller Site Selection Methodology' (Arup 2017) EFDC is advised to continue the approach of 'regularising' pitches, and refers to the DCLG's Planning Practice Guidance. This guidance sets out a sequential approach which places sites with existing planning permissions and sites where planning has been refused or withdrawn, high on the list for consideration. However it should be noted that the DCLG's guidance also requires plan makers to identify as wide a range of sites, as possible, but in broad locations. We therefore consider that EFDC has been too ready to use the existence of temporary planning permissions as the sole criteria for selection within the draft plan. The Planning Inspector granted temporary permission on RUR T1 & RUR T2 as a result of 'personal circumstances' but he gave considerable weight to MGB harm and determined that RUR T1 should be returned to its natural condition upon expiry of the temporary permission – it seems clear that without these personal circumstances, temporary permission would not have been granted. It should also be noted that conditions applied to both of these permissions have not been complied two years after temporary permission was granted. We therefore contend that the allocation of G & T sites in Roydon Hamlet is not consistent with national policy for the above reason and for these further reasons:-

- the sites are in the Green Belt. National policy, as set out in the Planning Policy for Traveller Sites (PPTS), clearly states that inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances; and that traveller sites are such inappropriate development.
  - the Hamlet Hill sites have already given rise to difficulties and concerns among local residents who feel that there is already excessive traveller accommodation in that area, whether official or otherwise. The PPTS requires local planning authorities to ensure that traveller site policies "promote peaceful and integrated co-existence between the site and the local community"; the proposed allocations, by over-concentrating traveller sites in Roydon and neighbouring Nazeing, contravene this requirement. Roydon already has over 65 pitches (an increase of 15 since the Essex Gypsy/Traveller/Showpeople Accommodation Assessment (2014) was carried out by the Essex Planning Officers Association. We note that it is proposed that up to five more traveller sites should be located in the Water Lane area, which would make the over-concentration of sites in this area even more marked.
  - the PPTS requires authorities to promote access for travellers to health services, and to ensure that children can attend school on a regular basis. Over-concentration of sites in one area risks imposing undue strain on services and resulting in non-compliance with these vital requirements
- We therefore contend that the allocation of two permanent traveller sites in the Parish of Roydon is not the most appropriate strategy and no evidence is supplied to demonstrate that the choice is proportionate when considered against reasonable alternatives.

There are also inconsistencies with national policy. The Parish Council believes that the draft plan is unsound in this respect.

**Please set out what change(s) you consider necessary to make the Pre Submission 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 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.**

Removal of the sites from the plan and allocation elsewhere in the district to provide a fairer spread of sites and mitigation of problems outlined. We would also like to see firmer action being taken against illegal sites and it should be noted that a distinction between gypsies and travellers should be made as, in general, they will not live together.

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

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 reinforce the Parish Council's view

## REPRESENTATION

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

Paragraph: D & 2.69

Policy: SP 2 Spatial Development Strategy 2011-2033

Policies Map: Yes

Site Reference: None of the above

Settlement:

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

Legally compliant: Don't Know

Sound: No

If no, then which of the soundness test(s) does it fail? Justified, Consistent with national policy

Complies with the duty to co-operate? 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.**

The plan states that traveller pitches will be delivered through the following 6 step sequential approach of which these are the first two:

1) The regularisation of existing sites with temporary permissions or other unauthorised sites where appropriate

2) Making the best use of existing traveller sites through intensification and extension, and the review of personal permissions where appropriate.

Prioritising sites in this way will adversely affect Roydon Parish because of the high number of authorised and unauthorised sites in the area. This methodology will increase disproportionately the number of sites and pitches in the area and sites, which generally gained temporary permission because of 'limited time' personal circumstances, will have a greater chance of becoming permanent. Additionally, if the district is providing sufficient pitches then there should be no need to regularise temporary and or unauthorised sites. The Planning Policy for Traveller Sites (PPTS) requires local planning authorities to ensure that traveller site policies 'promote peaceful and integrated co-existence between the site and the local community' as well as access to health and education services, so the proposed allocations, by over-concentrating traveller sites in Roydon and neighbouring Nazeing, contravenes this requirement.

As there are inconsistencies with national policy, the Parish Council believes that the draft plan is unsound in this respect

**Please set out what change(s) you consider necessary to make the Pre Submission 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 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.**

The sequential approach to delivering further traveller pitches needs to be amended to give less weight to temporary permission/unauthorised sites so that the north-west of the district does not become overburdened with permanent sites.

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

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 reinforce the Parish Council's view

## REPRESENTATION

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

Paragraph: 5.122 - 5.131

Policy: P 9 Roydon

Policies Map: Yes

Site Reference: None of the above

Settlement: Roydon

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

Legally compliant: Don't Know

Sound: No

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

Complies with the duty to co-operate? 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.**

Vision Statement

The Parish Council acknowledges that the plan's intention to retain Roydon's rural and local character and that the developments proposed, particularly in the conservation area, will be appropriate, sensitively designed and will focus on maintaining the existing settlement pattern. The statement preserving Green Belt and avoiding coalescence with Harlow Town is particularly welcome.

However, the vision statement also states 'the glasshouse industry will be supported and will continue to thrive by adapting to future challenges'. There are no glasshouses in Roydon village – these are situated in the wider Roydon Parish so this statement should be amended for the sake of clarity to complement the traveller accommodation statement for the wider area.

The Parish Council believes that it should have been consulted on the vision statement to ensure that it was factually correct.

**Please set out what change(s) you consider necessary to make the Pre Submission 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 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.**

Vision statement to be corrected.

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

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 reinforce the Parish Council's view

## REPRESENTATION

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

Paragraph: A

Policy: SP 5 Garden Town Communities

Policies Map: Yes

Site Reference: SP 5.2

Settlement: Water Lane Area

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

Legally compliant: Don't Know

Sound: No

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

Complies with the duty to co-operate? 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.**

The Water Lane area is predominantly located in Roydon Parish and will result in the Parish having the largest number of new homes of any area in the district, 2,100. For an area to the west of Harlow and away from strategic road improvements, this is disproportionate when compared to other urban extensions and especially when you bear in mind the area's proximity to village settlements.

Mapping shows no green space/green belt gap for the existing settlements at Broadley Common and Old House Lane (both in Roydon) despite the vision statement on pg 154 '.....ensure the continued preservation of the Green Belt, preventing coalescence between Roydon and Harlow Town'. In fact the Parish Council has always been told that these areas would have their own unique identity preserved and would not be absorbed into the Harlow urban extensions however the proposed development seems to extend as far as the back gardens in both these areas. This would effectively remove the green belt gap and result in coalescence of settlements which it is the plan's stated policy to prevent – therefore the plan is inconsistent in this respect.

Reduced glasshouse capacity in the Water Lane area seems at odds with the plan's aim that 'food has been agreed as one of the sector priorities for the London/Stansted/Cambridge corridor' and the loss of high quality agricultural land is also of concern.

The Parish Council believes that the plan is unsound as this will result in the two distinct areas being absorbed into Harlow and will also result in the loss of valuable agricultural land and glasshouse businesses.

**Please set out what change(s) you consider necessary to make the Pre Submission 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 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.**

A substantial green space barrier put in place between Broadley Common/Old House Lane and any new development.

Consideration given to reducing the number of properties to be built here and the retention of some glasshouse businesses and high quality agricultural land.

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

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 reinforce the Parish Council's view

## REPRESENTATION

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

Paragraph: G (ii)

Policy: SP 5 Garden Town Communities

Policies Map: Yes

Site Reference: SP 5.2

Settlement: Water Lane Area

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

Legally compliant: Don't Know

Sound: No

If no, then which of the soundness test(s) does it fail? Justified, Consistent with national policy

Complies with the duty to co-operate? 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.**

The Parish Council has already stated that there is an over-reliance on the Roydon area to accommodate gypsy/traveller sites which is contrary to the Planning Policy for Traveller Sites (PPTS) that requires local planning authorities to ensure that traveller site policies 'promote peaceful and integrated co-existence between the site and the local community' as well as access to health and education services. So the proposed allocations, by over-concentrating traveller sites in Roydon and neighbouring Nazeing, contravenes this requirement and therefore the plan is unsound.

**Please set out what change(s) you consider necessary to make the Pre Submission 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 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.**

Removal of the sites from the plan and allocation elsewhere in the district to provide a fairer spread of sites.

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

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 reinforce the Parish Council's view

## REPRESENTATION

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

Paragraph: G (ix)

Policy: SP 5 Garden Town Communities

Policies Map: Yes

Site Reference: SP 5.2

Settlement: Water Lane Area

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

Legally compliant: Don't Know

Sound: No

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

Complies with the duty to co-operate? 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.**

Road improvements are detailed for Harlow but this is just tinkering with the existing road network. The Water Lane area abuts the B181 (Harlow/Epping) which is already under considerable pressure with the volume of vehicles which use it each day and yet there are no plans to upgrade this even with 2100 houses being built. Epping is at the end of the central line and commuters choose to use this station rather than Harlow because it is considerably cheaper hence the traffic volume.

This plan assumes that all traffic will travel through Harlow for onward journeys – so improvements are being made there and towards the M11 - but this is unrealistic and it is, in our opinion, inevitable that 'back roads' will be used. This in turn will result in congestion, not just along the B181 but on other roads through the Parish particularly Epping Road (through Roydon Village), Tylers Cross/Hamlet Hill/Sedge Green and Dobbs Weir (towards Hertfordshire) as well as Common Road (towards Nazeing). Queuing traffic, from Hertfordshire in particular, has been known to get 'stuck' on the train line in Roydon village and a traffic survey, undertaken by the Parish Council in 2016 supported the traffic congestion problem and helped to stop a planning application for a large local development. These minor roads were never designed for the amount and type of traffic they currently have to accommodate, including glasshouse HGV traffic, and it is not uncommon to see the edges of roads exposed and large holes forming where vehicles have tried to pass each other. And this is before additional residential development comes on line.

The vision statement for Roydon village (p154), sandwiched between the Water Lane development and the Gilston Garden Town in Hertfordshire, states 'it will maintain its rural and local character'. The Parish Council and the people of Roydon support this vision but believe that this will be impossible to achieve without considerable investment in infrastructure improvements which unfortunately is not what is proposed in the plan. Therefore the plan is unsound in respect of the Water Lane proposals.

**Please set out what change(s) you consider necessary to make the Pre Submission 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 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.**

A reduction in the number of houses proposed and an Impact assessment of the works required to the surrounding road network (other than routes through Harlow) as we believe that local roads will not cope with the proposed increase in traffic.

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

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 reinforce the Parish Council's view

## REPRESENTATION

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

Paragraph: C (xii) & (xiii) & 2.117

Policy: SP 4 Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town

Policies Map: Yes

Site Reference: SP 5.2

Settlement: Water Lane Area

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

Legally compliant: Don't Know

Sound: No

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

Complies with the duty to co-operate? 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.**

It is completely unrealistic to assume, and to plan on that basis, that 100% of traffic exiting the Water Lane area will travel towards Harlow and that 60% of this will be by alternative transport – walking/cycling/public transport. The 60% figure is an aspiration but should not be a serious basis for planning unless there is evidence that this is achievable. Has this happened elsewhere?

Alternative transport has not happened at other new developments in Harlow - Church Langley has just one bus service and New Hall has none at all.

The plan is unsound in this respect.

**Please set out what change(s) you consider necessary to make the Pre Submission 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 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.**

Less emphasis given to alternative modes of transport and a more realistic traffic plan (based on increased car journeys both into and out of Harlow, westwards) considered and acted upon.

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

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 reinforce the Parish Council's view



## REPRESENTATION

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

Paragraph: Chapter 6

Policy: D 1 Delivery of Infrastructure

Policies Map: Yes

Site Reference: SP 5.2

Settlement: Water Lane Area

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

Legally compliant: Don't Know

Sound: No

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

Complies with the duty to co-operate? 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.**

Whilst developers are tasked with providing on-site road and transport options and the more strategic improvements to the road network (such as Harlow roads and the new M11 junction) are being dealt with by Highways England and the County Council, there seems to be little information in the plan on what action will be taken in respect of local roads having to cope with increased traffic, particularly in those areas away from the M11 and Harlow Town and yet sandwiched between development areas.

People travel by car because it gives them a certain amount of freedom but at the same time it is difficult to predict driving habits. With development west of Harlow, you are more likely to see the increased use of local roads – travelling across Harlow to access the M11 may not seem attractive.

**Please set out what change(s) you consider necessary to make the Pre Submission 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 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.**

A full assessment of current and predicted local road usage before any large scale development is carried out with a commitment to reduce the scale of development if it is shown that this is required and/or any negative impacts can be minimised through the use of Section 106 agreements etc.

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

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 reinforce the Parish Council's view

**Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination**

Yes

Signature: Janet Ballard Date: 28/01/2018