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c/o District Council Offices



The EFDC Submission Version of the Local Plan (2017) - a further submission to the Inspectorate, in view of the non-availability of parts of the Evidence Base not being published. Relating to the area of Epping Town & surroundings.

1. **Publicity.** There has been next to no publicity that Representations had been reopened. I understand that some parties who had made original Section 18 submissions had received a letter, but I had not. Almost none of the approx. 10 people I know in this category I have talked to were not aware that further points could be made. This is therefore not a fair process, rendering the process unsound.
2. **Submissions.** As part of No.1 it is to date not made clear how, to whom, or by when further submissions might be made. I assume that letters / emails to EFDC / ldf will be acceptable. I cannot see a Covering Form to complete. Again if not, it shows the process to have been unfair.
4. **"New" evidence.** The documents now available on <http://www.efdclocalplan.org/local-plan/submission-documents> include upwards of 50 (I have not counted!), dated 2018, items which were not accessible when making my original submissions. I assume the Councillors and Planners had them but we, the "consulted" did not – I think this has partly triggered the Judicial Review now taking place; and is further evidence that the process was unsound; also as I will show the Submission Version of the Plan runs counter to some of the evidence now revealed, making it even more unsound.
5. **Transport provision.** In my earlier submission I outlined the already inadequate infrastructure, particularly roads. Now I can read EB502, dated mid-December 2017. This Report predicts traffic growth of at least 36% and possibly as high as 62%; while para 4.5.2 tells us that several local junctions are already "exceeding their capacity". One of these is the Ivy Chimneys traffic lights (part of para 4.5.8) which is the most likely access point to the planned Epping South development. 4.6.2 has "the constrained transport situation outlined is therefore expected to worsen with the

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introduction of Local Plan growth even with the introduction of reasonable sustainable modal shift.” To plan for these increases cannot be sustainable nor sound.

I attach a recent letter by the Prime Minister to her local Council, which refers to the priority of infrastructure being in place, before housing is developed. The documents now available do not carry this message; speaking instead of infrastructure being paid for by housing developers as they build.

6. The proposed relocation of **Epping Sports Centre**. EB713 says that policy should “meet local demand”, and that facilities be “accessible, inclusive and open to all”. One assumes this would include those unable to drive to North Weald, i.e. the young and the old – two groups frequently identified as benefitting from access to sports facilities. Some independent research (Guardian newspaper, 19 April 2018), has estimated that relocation would generate an additional annual 30,000 car journeys – with the associated pollution & congestion. This report also speaks much of a maximum 20-minute drive time to facilities; in the rush hours at present North Weald can be more than 20 minutes, and this is predicted to worsen – see 5. above.

It is also worrying that Epping Sports Centre is nearing the end of a reported £1M refit, with the Council’s support, while the same council is proposing to close it!

6. **Playing pitch capacity**. Documents EB714, also 714 A-J report that by and large present provision in the Epping area is “satisfactory”. However not all documents take account of the projected rise in population and the likely rise in demand for such facilities. The plan is projecting for a deliberate “unsatisfactory” provision?

7. **Site selection reports**. I appreciate that these had to be published after the consultation on the draft plan had concluded, and are meant to take into account the views expressed. What I find peculiar is that some sites were deselected because of significant negative views expressed by the local community, while in other cases, what I see as equally significant local views have been disregarded. The most obvious example being Jessel Drive in Debden, with other questions over certain sites eg in Theydon. If local views are sometimes accepted and sometimes ignored this should be justified in the Site Selection documents. One asks how the Council decided when to listen and when not. Again, unsound.

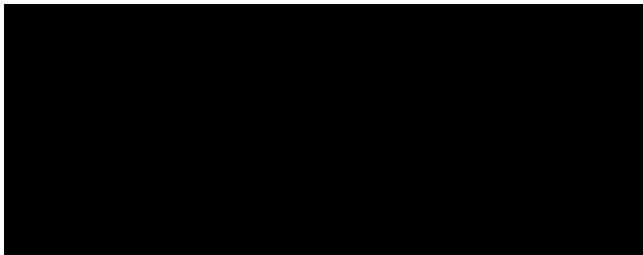
8. **Epping South**. There appears to still be no Master Plan for one of the largest areas of growth; the draft had said that it would follow. Is EFDC really submitting a plan without such a key document? If so, this is not a sound practice and we the public are still unable to be consulted on it.

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9. Lastly the use of **Green Belt land**. The "new" EB 1608 says "The National Planning Policy Framework (NPPF) states (at paragraph 83) that, once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan", and para 3.11 states that the planners have "determined there is insufficient land available outside of the Green Belt to meet the development requirements of the District". As in my earlier response I still maintain tis to be an inadequate judgement, in that I believe the Council have not explored the full possibility of brownfield sites within settlements and also of increasing the density of existing / planned developments. To give one example – the planned growth at St John's Road, Epping (which is presently "stalled" again), intends fewer than 40 homes. A mixed development here could easily accommodate many more homes in slightly higher-rise buildings (eg 3 or 4 storeys) which would not be out of place in a town centre.

Thus based on a large number of documents not being made available when the draft plan was available for consultation, and some of the new documents revealing further significant areas of concern, I consider the plan to be unsound and the process to have been unfairly conducted, so I would urge the Inspectorate to return the document to EFDC for reconsideration.

I would be grateful if you could confirm receipt of this, to lowryepp@gmail.com



Mr Roger Lowry

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App. T.May letter



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20 February 2018


Re: Claires Court Planning Applications

I am writing regarding the above as many of my residents have written to me and raised their concerns about all the planning applications that are attached to the Claires Court site.

I know that a residents meeting took place at the end of January to discuss Claires Court and that the main concern was the traffic implications for this site. I have subsequently received attachments and pictures from residents which show how heavy the traffic is in the area around Cox Green. Residents are naturally concerned about how the Royal Borough will deal with this matter as more houses will increase the amount of traffic. A development of this size should not be permitted unless the infrastructure needs have been met.

Another concern is the impact on the Green Belt. As I have previously made clear, I certainly recognise the importance of Green Belt and its protection. Many residents are worried about the implications of building on such a vast site, which is on Green Belt, and how this will affect the local environment.

I would be grateful if you could comment on the above and respond to me in due course.

Yours sincerely,


The Rt Hon Theresa May MP

CC: Cllr Simon Doddy, Leader of the Royal Borough of Windsor and Maidenhead