

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 * 28/1/18

Representation Number * HS 4

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

Paragraph various relating to the policies, settlements and issues raised

Policy SP4, T1, T2 and others by implication e.g. P1, P4, P6,P9, P12,

Policies Map Yes, including Map 2.1 on page 39 of the Plan

Site Reference including SP5.1 specifically and other locations/sites not referenced in the Plan

Settlements Ongar, North Weald, Epping and smaller nearby settlements; Roydon and Lower Sheering with other nearby smaller settlements; Harlow/Latton Priory

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, .tifUploaded: 0/10 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.*

This representation covers a range of issues, largely omitted in various ways, from the Plan. And aspirations in the Plan's text that haven't been translated into implementable policy and practice.

The Plan recognises the effects of traffic on the District, including pollution effects and congestion which even now, without additional homes and employment, causes problems especially at peak times. Both pollution (including non-tailpipe/exhaust pollution which will continue even when all cars are electric-powered) and congestion will worsen over time, and this is very unlikely to end at the end of the Plan period in 2033.

The plan also recognises the need for sustainable travel by non-car modes, including buses (but ECC bus support faces further cuts), cycling, walking and rail transport.

But the Plan, and the alternatives the SA Non-technical Summary reports upon, don't appear to have considered sufficient reasonable alternatives to minimise and mitigate the ill-effects of increasing car use. An exception to this comment on the SA is that Theydon Bois was identified as a possible location for a larger amount of new development east of the Central Line, and that seems reasonable although not ideal.

Housing allocations at North Weald (c.1,050) and Ongar (c.590) totalled mean that the commuting residents arising from some 1,640 dwellings, with potentially more after the current Plan period, will have to drive to commute, even where they continue their journey by Underground. Whatever the exact number of commuters arising, they will add to the figure of the many existing residents of these 2 main settlements who benefitted from an Underground service before its closure by London Underground Limited (LUL). That closure was claimed to be due to lack of use at the time, although anecdotal evidence was that passengers boarding at these places could easily avoid buying tickets, and did so, thus true passenger fare numbers didn't present the true picture.

There is a very sustainable opportunity to use the Epping-Ongar Railway route to provide services feeding into the Central Line, even if only at peak hours initially. This route needs to be specifically safeguarded and mentioned in the Transport Safeguarding Policy T2. And Section 106 (S106) contributions from North Weald and Ongar sites, together with CIL contributions from all new dwellings within reasonable travelling distance of Epping, North Weald and Ongar. The reason for new homes in places like Epping to contribute via CIL is that Epping Station, station car park or nearby residential roads, and roads into and through Epping to the south are all affected by the lack of a Tube service serving Ongar and North Weald. The commuting residents from Ongar and North Weald who could use a local rail service either tend to use roads through Epping leading to the station and use the car park at Epping, or drive straight through Epping and through Epping Forest SAC. Thus Epping residents would benefit from CIL contributions to an improved Epping-Ongar service.

One item for S106 and CIL would be improvements at Epping Station. After the Epping-Ongar Underground branch line closed the main Underground's signalling was modernised. Modernising Epping-Ongar line signalling to be compatible would mean that trains from North Weald and Ongar could draw into platforms at Epping and enable passengers to alight and remain on the platform before boarding main Underground services. (The cost of this some years ago was estimated at over £500,000, but I don't know if technology has become cheaper since then.) This direct connection at Epping platforms would greatly benefit the Epping-Ongar Railway's operators whose customers have to use vintage buses to get to its North Weald terminus (and vintage buses are not subject to pollution/emissions controls, so they pollute the hill at Station Road in particular). Running for example a peak hours service would bring needed revenue to the Railway's operators, to help with their programme of maintenance and improvements.

The problems identified in the Plan about potential users of West Anglia mainline rail services instead using Central Line Underground services has been address in another of my current representations about Epping and Loughton. With those

potential users encouraged to use mainline services two further reasonable alternatives arise: at Roydon and Lower Sheering.

Roydon would be a sustainable location for housing growth, having a mainline railway station and being close to Harlow's western employment areas. There would appear opportunities for a bypass of Roydon's Conservation Area, e.g. to the west springing from two places where existing roads are close to the green belt boundary. Such a land allocation would include bypass road construction and could include recreational land to take pressure of the Lea Valley SPA (and benefit existing residents), plus land for a station car park to benefit existing residents from that part of the District.

Lower Sheering is close to Sawbridgeworth mainline station and the services provided at that larger settlement. Its more than proposed enlargement would also access more sustainable modes of transport (with some potential additional car parking not too far from the station to serve residents of that part of the district).

Adding housing allocations around Harlow in the District east and west of Harlow seem reasonable. However the Latton Priory site SP5.1 allocation seems far too large. The ridge at Rye Hill has been identified, at least in an earlier version of the Plan, as an important feature: it forms part of the natural 'bowl' within which Harlow sits. Previous work by EFDC officers at the time of the East of England Plan found only capacity for a few hundreds of homes at this location. I object to the proposed "Indicative access road for Latton Priory" shown on Map 2.1 on page 39 of the Plan: this runs right across open countryside Green Belt land from Epping Road south of M11 Junction 7 to site SP5.1. Apart from the damaging effects of this road on the landscape, it would undermine the Plan's aspirations for intensive public transport routes from the new land allocations around Harlow into the town. A similar problem occurred at Church Langley where that Harlow extension had direct links to the road network close to the M11, so that Church Langley functioned as a separate entity, a dormitory place entirely unconnected with Harlow. The proposed "Indicative access road" will do the same for SP5.1, and also make adjacent existing areas of Harlow likewise attractive to motorway commuters. In other words the damaging effects of the new access will be wider than the countryside it runs through and the new allocation it is intended to serve.

When areas around Harlow were looked at as part of east of England plan preparation admittedly the promoters of north of Harlow found capacity for up to 12,000 homes in the period up to 2031, with up to 25,000 beyond that. So there would appear a better (and reasonable) alternative to placing all c.1,050 homes at Latton Priory: the opportunity to move some 700 homes to north of Harlow, closer to the town's main employment etc. areas and stations as part of what will be a purpose designed urban extension; with all the potential to build-in sustainability, particularly sustainable transport, right from the start. By contrast this will be much harder to successfully achieve in small extensions to the southern (and western and eastern) edges of Harlow. I can understand why some development might be needed at places other than north of Harlow (to provide choice in the land market, sites near existing infrastructure which can be built soon in the Plan period to assist the housing trajectory) but this can be done without the overly large quantum of development at site SP5.1.

In the light of the above, and the implications arising, I don't consider the Plan Justified. I do not consider the Plan Effective, in terms of its delivery over its period in the ways the plan envisages: its laudable aspirations won't be deliverable 'on the ground'. I don't think it will enable the delivery of sustainable development, and not in accord with national policy.

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 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 all the various issues and concerns raised in this objection; and question their approach and responses as necessary.