



**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	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Barbara"/>	<input type="text"/>
Last Name	<input type="text" value="Robertson"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="/"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="/"/>	<input type="text"/>
Address Line 1	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 2	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="REDACTED"/>	<input type="text"/>
Telephone Number	<input type="text" value="REDACTED"/>	<input type="text"/>
E-mail Address	<input type="text" value="REDACTED"/>	<input type="text"/>

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

The Plan is too long & complicated to break down my response in this way (given the lack of time)

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

The Plan contravenes National Policy in a number of areas :-
Protecting Green Belt
Conserving & enhancing historic environments
Ensuring the vitality of town centres
Promoting healthy communities
sustainable transport
wide choice of homes
No exceptional circumstances are proven.

(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.

I am bamboozled by the Plan but have set out my comments on separate sheets.

The Plan is too long & complicated - perhaps deliberately so ?

I only have the website version which I find difficult to navigate. Obfuscation is the word that comes to mind.

(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 would be interested in attending the hearings as a witness/observer rather than to participate.

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

7 additional pages attached

Signature:

[Redacted Signature]

Date:

29/1/18

Barbara Robertson, [REDACTED]

EFDC Plan

Contravenes national policy by not protecting the Green Belt

1,300 new homes are planned in Epping (which is a 25% increase), three quarters of these will be on Green Belt.

3,900 homes are planned in Gilston Garden Village on Green Belt and there has been no public consultation about this.

The Green Belt should only be built on in exceptional circumstances when all other options have been explored - this is clearly not the case.

There are many regions in the area which could each be expanded in a smaller way so as not to cause such vast disruption e.g. Sawbridgeworth, Moreton, Ongar, Fyfield to name a few.

The Council has not done due diligence by identifying brownfield sites in the EFDC area which could be built on without stealing Green Belt land. For example Waltham Abbey and Nazeing contain many such sites.

EFDC has not given any consideration to building higher density properties in areas of older housing stock that need replacing e.g. Waltham Abbey.

The council has not published details of what consultation has been undertaken, if any, and what the outcome was.

Barbara Robertson, [REDACTED]

EFDC Plan

Conserving and enhancing historic environments

Epping is a historic market town with many old buildings, including Grade 1 and 2 listed properties. It was granted a market charter in 1253 by Henry III.

The council has done nothing in the past to protect the buildings in the High Street with the courts, historic pubs and many other buildings being demolished to make way for expensive luxury apartment dwellings.

The final straw really would be high rise multi-storey monstrosities built on the few car parks we have. These would be totally out of keeping with the present buildings.

The council should produce a strategy for conserving and enhancing the town centre and publish it alongside the Plan.

Barbara Robertson [REDACTED]

**EFDC Plan
Ensuring the Vitality of Town Centres**

The heart will be ripped out of Epping if the council goes ahead with its plans for the town centre.

The library will be closed, as will the Registry Office. Where will we go to get married or register births and deaths?

Many elderly people in Epping do not have the internet and depend on the library.

The sports centre is a hub of activity for everyone from very tiny toddlers to the elderly. Many people will not be able to get to an out of town centre.

The council closed down the Adult Education Institute in St John's Road many years ago and there has been no adult education available in the town since - and the building is still derelict.

The High Street is reduced to a collection of charity shops, banks and coffee chains.

What is the council actually going to do to ensure the vitality of the town centre? The plan does not address this.

Barbara Robertson, [REDACTED]

EFDC Plan

Promoting Healthy Communities

The council is contravening national policy by removing a well used sports centre from the hub of the town just to build a few new homes.

The sports centre is undergoing a £13 million refurbishment which is due to be finished next month - what a waste of money to demolish it.

Everybody walks to the sports centre because there is almost no parking. Mums with buggies walk their toddlers to classes during the day, and their 5-11 year olds after school for activities. The older residents walk to the sports centre for a well used selection of classes for the over 50s. Working people walk there in the evening for a wide variety of classes.

Moving the sports centre out of Epping town will cause a huge amount of extra traffic because everyone will have to drive - the bus services are woefully inadequate and very expensive. Many people will simply not bother to go out of town, will a resultant loss of good health and increased risk of obesity.

Young people have been leaving Epping in their droves because there is no affordable housing, and no new social housing. This has resulted in the elderly becoming increasingly isolated with no family network to support them.

There are already not enough doctors surgeries - it is a 2 or 3 week wait to get an appointment in the Epping High Street surgery.

It is not acceptable to demolish perfectly good facilities such as the library (modern building) and the sports centre (newly refurbished) for just a handful of new homes that nobody local will be able to afford.

The proposed housing plans will create a huge amount of extra traffic through the High Street with the resultant congestion, air pollution and environmental problems - this is not conducive to promoting a healthy community.

Barbara Robertson, [REDACTED]

EFDC Plan

Sustainable Transport

"Discouraging the use of private transport, and improving the efficiency of buses and trains"

The plan contravenes national policy on so many levels it is hard to know where to start.

900 homes are planned in the South Epping area - are they all going to be built with a covenant stating that cars are prohibited, as in the case in areas of many London Boroughs? Of course not. There is no public transport and everyone will just drive - will potentially 2 or 3 cars per house.

For the plan to state there will be 'no extra car use' is blatantly untrue.

At present people drive from far afield to use Epping Station because tube fares are cheaper than main line rail (the car park is full by 7.00 a.m.) with cars driving in from Ongar, Brentwood, Braintree and Harlow.

Another 3,900 homes in Harlow will onlyacerbate this problem

The bus service in the Epping area is lamentable. The last bus to Waltham Abbey leaves at about 6.00 p.m. There is no bus service to Woodford or Chingford at all.

When the Central Line is down at Epping (as frequently happens) TFL announce that your ticket is valid on the buses - there are no buses to anywhere London bound. There is a mad scramble to get taxis or call on relatives to get you to Chingford by car.

There are a few buses to Harlow but a 15 minute car trip turns in to a 1 hour journey on a meandering (and expensive) bus. People are too busy for this - as well as the aggravation of transporting babies, buggies, toddlers and heavy shopping.

The Plan states that there is no current shortage of car parking - this is not true in Epping Town centre at the weekend as everybody knows. Where is the proof of this?

TfL claim that the Central Line is underused - this is also blatantly untrue. Please send a representative to travel between Central London and Epping on a weeknight between 6 and 7 p.m. The Central Line is already the line from hell, and thousands of new homes will be the straw that breaks the camels back with more people taking to their cars.

For the council to declare that "people should make better use of existing transport services" is laughable - cattle are not allowed to travel in the conditions on the Central Line - and this is the only way of getting to London.

Station approach is gridlocked every evening - buses are at a standstill every week night because is is not possible to get up and down this narrow road - building flats on the station car park will make this worse and will not improve the efficiency of the buses.

What is the council planning to alleviate this?

Barbara Robertson, [REDACTED]

EFDC Plan

Wide Choice of Homes

I have lived in Epping for over 20 years and have not seen any evidence of any new social housing being provided in the town.

I have also not seen any evidence of new "affordable" housing that is actually affordable for local people.

All the developments in the town centre have been that of luxury 1 or 2 bedroom apartments selling for £400,000 - £650,000. These are typically bought as investment properties and rented.

The council has done nothing to provide homes for local young people who are leaving in droves to find affordable accommodation elsewhere.

As far as I can see the plan does not specify how a wide choice of homes will be provided - this needs to be set out more clearly and is an abject failure on behalf of the council.

Barbara Robertso [REDACTED]

EFDC Plan

Miscellaneous

Roads

There has been no public consultation regarding the road network needed to support thousands of new homes. Has the council carried out a traffic feasibility study?

Nearly 4,000 new homes in Harlow together with 1,300 homes in Epping will have a significant effect on Epping High Street.

The High Street is regularly brought to a standstill because of the volume of traffic. This is exacerbated whenever there is an incident on the M11/M25 and the whole of the motorway traffic, including all the HGVs, trundles through the town.

A by-pass is potentially needed to protect our historic market town.

Water supply

I have recently been forced to have a water meter fitted because "Epping is in an area of severe water shortage". Have any studies been done on the impact of thousands of new homes on the water supply?

Environment

Has the council undertaken impact studies relating to air quality, pollution, congestion etc.

Green Belt Boundary Amendments

I understand that Green Belt boundary amendments will not be approved until after the EFDC Plan has been adopted. Surely this is the wrong way round?

Consultation

Publishing a plan on a web site is not consultation. Many older people in EFDC do not even have access to the internet. I live next door to the council offices but have not received any communication about the Plan - nothing through the letter box. I consider that there has not been a full and proper consultation, and I have only just found out (2 hours before the deadline) that I could have purchased a paper copy of the plan. This would have been so helpful for reference and note taking but is not mentioned on the web site as an option.