

Stakeholder Reference:
Document Reference:

Part A

Making representation as Resident or Member of the General Public

Personal Details		Agent's Details (if applicable)	
Title	Mr		
First Name	Mark		
Last Name	Hickey		
Job Title (where relevant)			
Organisation (where relevant)			
Address			
Post Code			
Telephone Number			
E-mail Address			

Part B

REPRESENTATION

To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?

MM no: 46

Supporting document reference: D. Epping Forest Interim Air Pollution Mitigation Strategy, December 2020 (ED126/ EB212)

Do you consider this Main Modification and/or supporting document of the Local Plan to be:

Legally compliant: No

Sound: No

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

Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. 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.

As part of their HRA and APMS, EFDC propose a Clean Air Zone (CAZ) covering certain roads traversing Epping Forest SAC.

I understand it may take an act of Parliament and require approval of Essex CC and there is no certainty that can be achieved. What I fail to understand is EFDC have announced they are releasing planning permissions now, based on a CAZ being imposed in 2025, when there is no guarantee, they can deliver it. How can that be legal?

A CAZ will move traffic and pollution to other roads surrounding the Forest and cause increased levels as people drive further and for longer to circumnavigate the zone. Inevitably smaller roads around the Forest will become congested rat runs and traffic and pollution levels will increase in residential areas. Similar schemes have caused grid lock when large commercial vehicles divert into narrow roads to avoid a charge.

The notion that an increasing number of Electric Vehicles (EVs) will reduce pollution levels is aspirational. Fine for short journeys. Epping Forest District is semi-rural and other than the Central Line has poor public transport so many people rely on cars.

EVs have a relatively short range and are unsuited for commercial applications carrying heavier loads and driving longer to varying destinations. I am sure in your visits to certain parts of the district you will have noticed a proliferation of commercial vans used by local tradespeople. An EV is not suited for such purpose and people will be faced with changing a vehicle, if they can afford to, avoid the CAZ or pay a fee.

Many local homes are flats, do not have driveways or the facility to park close by so installation of a charging point is not always possible. Charging points in the district are few and far between and half of those on the retail park in Langston Road, Loughton have been taken out of service.

A CAZ will penalise residents for poor site selections by EFDC. I have followed the local plan process since 2016 and there has been indifference to public opinion and advice from many experts and organisations by the Council related to protection of the SAC. Rather than take pride in the Forest and protect it EFDC have shown intransigence.

Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document 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.

The solution would be for EFDC to reduce the housing requirement, as I understand you have suggested. As that was declined a simple solution would be to select sites away from the Forest and obviate the necessity for a CAZ.

A requirement for a healthier environment is in the interests of all but a CAZ near the M11 and M25 will make minimal difference.

Signature: Mark Hickey Date:
26/07/2021