

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 * 27/1/18 XXXX

Representation Number * HS 1

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

Paragraphs: Chapter 5 relevant paragraphs and Appendix 6 text and site plans; plus relevant Plan text regarding transport and commuters using the Central Line rather than mainline railway services. Chapter 3 relevant text.

Policy P1, P2, T1

Policies Map Yes in respect of site boundaries for EPP.R5

Site Reference EPP.R3, LOU.R1 &.R2

Settlement Epping, Loughton

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, .tif*Uploaded: 0/10

The Plan's approach to setting out both policy and detailed site requirements for allocated development sites is very good. It tells developers/land owners what they should know and take into account in their plans and financial decisions;

it also informs local people of what to expect. Given the number of allocated sites, it isn't surprising that some details could do with strengthening/amending.

However the policy and details in Appendix 6 for the Epping Station Car Park site as they are currently formed are insufficient and not sound. One of the aspects below also refers to similar car park sites at Loughton and Debden.

There are bad traffic and congestion problems at the junction of Station Road, Station Approach, Kendal Avenue and Bower Hill bridge in Epping with vehicles including buses trying to make turns and access the Underground station. This annoys not just drivers, their frustration leads to mass honking of car horns to the annoyance of adjacent residential properties.

So before any more development takes place off Station Approach this junction's problems need resolving. At least a roundabout, with Station Road Eastbound divided into two lanes of traffic: one for straight on and the other for turning right into Station Approach. Or a better arrangement to be proposed by ECC Highways. It is noted that the housing development proposed is meant to be limited car ownership (with car sharing/pooling and spaces for visitors and disabled drivers/blue badge holders), but this will still lead to an increase in car traffic, including as the building supplies site is also to be developed.

The Plan's Policy should make it clear up-front that this junction improvement is a pre-requisite to development of Site Epp.R3: just stating the problems "may necessitate improvements" (page 6, Appendix 6) is wholly insufficient. There is a need for Plan policy to clearly require significant junction improvements whether or not a site brief is produced before a planning application is made; with the pressing need for housing an application may come forward before a brief is produced and even if refused by EFDC it may be granted on appeal by someone who doesn't fully appreciate, or experience on a daily basis, the problems at the junction.

The Plan's wording about improvements to cycle and pedestrian access to the station to minimise conflict between different road users etc. (as page 6, Appendix 6) is okay in theory, but sounds like word-processed text from somewhere else as it is impractical in relation to the site. The road has a fairly narrow footway on one side only. And where it nears the bridge the levels of the railway bankside fall away significantly so widening it would appear impractical; as well as being outside the site allocation's boundary. This boundary may thus need changing.

In addition to this single narrow footway the road comprises only one fairly narrow lane in each direction: sufficient for a car but rather narrow for the buses which run in each direction; it is especially narrow given the informal drop-off and collection of passengers by car drivers means a line of cars stopping and/or waiting along one side of the road.

There are also issues of: parking capacity; the CPZ contributions the plan refers in recognition of overspill parking on residential etc. roads beyond car parks; and the problem the Plan recognises of commuter driving from distant parts of the district to use Central Line services as they are cheaper than the mainline rail services available just outside the district boundary (2 stations) and at Harlow (2 stations). The Plan says that the planning system cannot do anything about this, but it can as below.

It can be expected that, even with more of a jobs:workers balance (which needs improving, as referred to in other objections) in Epping and Loughton-Debden, additional housing required to meet OAN will generate additional commuting on the Central Line. As there will be more land available at Epping EPP.R5 (with the inclusion of the building supplies site) more parking than the current 534 spaces should be provided to meet additional needs in the Plan period and the Plan should require this as part of development of the site. More parking capacity at Epping should lead to those

commuters who have had trouble finding a parking space, and thus tempted to make their journey by car instead, to be more inclined to use public transport and reduce vehicle emissions - especially as many commuting journeys will be through Epping Forest Special Area of Conservation (SAC) which is being harmed by vehicle pollution.

It is all very well for the Plan to mention contributions to CPZs and these help local residents affected by overflow parking arising from a shortage of spaces. But that doesn't help those who need to park and commute; they get pushed further away from an Underground Station by CPZs, having to walk further (while potentially annoying residents further away) with longer journey times. The further away they get pushed, the more likely they will use their car exclusively for their journey. Instead of displacing the commuter parking problem from one area to the next it should be tackled while there is an opportunity in a positively prepared Plan that looks ahead to 2033!

An increase in capacity can be gained in another way than just a larger site area as follows (both methods should be used in combination).

Differential parking pricing should be a requirement of the development of EPP.R5, LOU.R1 and LOU.R2. For example a standard rate for postcodes near to these stations to encourage local use as an alternative to the car and for new residents of homes allocated in these towns; and a higher rate for commuters from postcode areas near to mainline stations and further afield. The differential pricing would reflect the difference in rail travel costs of Underground compared to Overground services. The technology is available, e.g. Automatic Number Plate Recognition (ANPR) is being rolled-out to 28 Underground stations in one year and vehicle number plates tie to postcodes of addresses where they are kept (as with CPZs). While I understand that TfL now operates the West Anglia Mainline and has ideas to even out pricing in due course, until this happens differential car parking pricing would discourage car journeys (with attendant pollution and congestion, e.g. in Epping High Street) through the district from near to Roydon and Lower Sheering stations to Epping and Loughton-Debden. (Another representation suggests a way that parking capacity near Roydon Station could be increased, as part of development there, to better serve nearby settlements and rural areas in the District and make sustainable transport choices more attractive.)

For the reasons above I consider the Plan not to be justified (the most appropriate strategy when considered against reasonable alternatives given the evidence); not enabling the delivery of sustainable development and not consistent with national policy.

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.

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 oral 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 responses as necessary.