

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 * 26/1/18 XXXX

Representation Number * HS 2 XXXXX

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

Paragraph 3.53

Policy E2

Policies Map **Yes** No **YES**, in terms of omissions from the policies map

Site Reference = possibly various

Settlement = various including Epping and Loughton as the main town centres

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

Paragraph 3.53 sets out estimated retail need over the Plan period and makes an assumption about the proportion of the 39,700sqm (after pipeline development) that should be met outside the District: 40%.

There seems no evidence of the Duty to Cooperate about that provision outside the District. Nor what type/s of retail this might be for anyone to judge whether the 40% assumption of new retail floorspace being met outside the District is appropriate. This should be stated in the Plan.

There is no indication of what proportion of the remaining 60%, 23,820sqm. or nearly 2.4ha. of retail floorspace (plus parking where dedicated to the retail floorspace, if not shared parking) should be convenience or comparison. This should also be in the Plan.

Nor does Policy E2 (or any other strategic policy) make any land allocations for this retail floorspace, even though both NPPF and NPPG state that anticipated retail need should be identified and **met in full** in plans (in the same way that OAN for housing should). The Plan identifies housing and employment sites, but omits retail; despite laudable intentions to enhance town centres; which retail allocations would do significantly. A lack of allocations for estimated demand is likely to lead to unplanned out-of-town developments as at Langston Road Loughton (Epping Forest Shopping Park) since the last Plan and Plan Alterations. This is a failure of planning, as is the following about making the right allocations for available sites.

Retail sites need to be considered alongside the allocations the Plan proposes; to ensure that those uses are on the best sites and that the most useful potential sites for retail aren't allocated for another, less appropriate, use. For example the Bakers Lane and Cottis Lane car parks in Epping are proposed for housing and retained parking; whereas their use for retail would greatly benefit the adjacent town centre, far more than just some more housing units (which could more easily be located a little further away- they don't have to be town centre, edge of centre, and can be out of centre/town). This would reduce the need to travel for shoppers, provide opportunities for linked shopping and work-shopping trips (where employees work in or near the town centre), reduce harmful emissions, and through potential shared-use parking make the best of available parking space and urban (non-greenbelt) land.

The employment potential of retail should be recognised:

on its own as an employment source in addition to B Class office and industrial employment; and

providing local employment to new residents whose homes will be on new land allocation sites; helping the jobs:workers balance and thus reducing the need for resident workers to travel, c.f. to out of town stores or other towns (as well as residents who shop and use town centre services traveling less far and by more sustainable means like walking and cycling).

Mention is made of the St. John's Road site in Epping and a brief that mentions an unspecified amount of retail. However, this is not a Plan allocation and given some thought has obviously been given to retail at that site it should be specified and allocated in the Plan.

Retail, especially where car parking is dual use / shared with other uses, need not be land hungry: retail over ground and mezzanine floors has been accepted now by the industry in new buildings (previously retail resisted more than one storey layouts); and housing above retail has become far more common (so single use retail sheds are no longer a requirement).

The above points seem to have been missed in the SA of the Plan.

Retail allocations should have been in the previous consultation version of the Plan; as should employment sites allocations which were also absent.

So the Plan is unsound as it isn't Positively Prepared, Justified, Effective, nor Consistent with National Policy and Sustainable Development.

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: **

Because I want to hear and question EFDC's response to the issue raised, how it will deal with them, what allocation/s it intends to make and the knock-on effects / consequences of such allocations, both good (including enhancing town centres etc. as above) and otherwise.