Representation form for Submission Version of the
Epping Forest District Local Plan 2011-2033 (Regulation 19 publication)

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	Mr
First Name	Charles…….
Last Name	Geddes……..
Job Title (where relevant)	
Organisation (where relevant)	……..
Address Line 1	…….
Line 2	…….
Line 3	……..
Line 4	
Post Code	……
Telephone Number	…….
E-mail Address	……..

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	The whole of the document "Epping Forest Local Plan, Submission Version 2017" being a local resident my comment are focused on the parishes of Epping Town, Theydon Bois & North Weald. Specific details as covered in Section 6.	Policy	Policies are referred to in the "Epping Forest Local Plan, Submission Version 2017" but mainly referring to Epping Town, Theydon Bois & North Weald. Specific details covered in Section 6.	Policies Map	Maps are referred to in the "Epping Forest Local Plan, Submission Version 2017" but mainly referring to Epping Town, Theydon Bois & North Weald. Specific details covered in Section 6.

Site Reference	As above	Settlement	As above

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	There is a lack of consultation evidence. The 2017 submission has failed to take into account the consultation in 2012 and responses to the 2016 Draft Local Plan. See details listed in Section 6.	Effective	No it is not - See details listed in Section 6. It is not workable or sustainable.

Justified	It has failed to take into account the consultation of 2012 and response to the 2016 plan. See specific details listed in Section 6.	Consistent with national policy	Green Belt Policies are not being applied. See specific details listed in Section 6.

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

Page 2 papa. 1.1 "The Epping Forest District Local Plan sets out the strategy for meeting the District's needs from 2011 up to 2033. It is based on up to date evidence and the **results** of the previous consultations undertaken in 2010/11, 2012, and 2016." I strongly disagree with this. Having taken an active part in these – this is not "results of the previous consultations"

Failed duty to co-operate, **is unsound & is not legally compliant.** The following are all issues.

The 2016 Draft Plan consultation ran for **9 weeks** from 28th July 2016 to 30th September 2016. I note the Redbridge Submission Plan Consultation ran for 9 weeks. Unfortunately Submission Plan Consultation was over Christmas and was 6 weeks! The extended closing times during the Christmas break impacted the nearly all venues for printed copies. These venues were at Epping Civic Offices, Epping Hemnall Street Community Services Offices, Epping Library and Epping Sports Centre. There was no publicity of the Submission – only those who had taken part in 2016 were informed via email/letter. Very few people knew about it!

The 2015 Strategic Housing Market Assessment (SHMA) did not include the neighbouring London Borough of Redbridge. This London Borough is on the London Transport Central Line Tube. An original member - Broxbourne District Council dropped out of the SHMA. As the majority of the suggested increased need for housing in the town is from incoming moves - this omission and loss of a participant is a failure.

Exceptional circumstances must be justified for every Green Belt site proposed in the 2017 Submission. This is not shown in each of the submission land blocks. There will be a percentage of respondents who are not aware of which of the submission land is actually Green Belt. This is a failure to co-operate with the respondents.

Almost all of SR-0113A has been added since the 2016 Draft Plan. No reasons have been given. SR-0113B has been extended east to include the Brook Road Play Area – 0.8Ha. Land south of SR-0069/33 shown as SR-0333Bi has been added – 4.23 Ha. SR-0445 just south of Eppingdene has been extended by 0.44 Ha by adding SR-0333Bii which is adjacent on the Report on Site Selection ARUP. The ARUP report used the same site designations as the 2016 Draft Local Plan Consultation.

5.144 Thornwood the majority of this massive increase in a small village was not consulted on in 2016. The area will be swamped the aim of (i) Highways and junction upgrades; (ii) Local utilities upgrades; (iii) The improvement of open space throughout the settlement; and (iv) Community uses. Does nothing definite for the village. Failed duty to co-operate, is unsound & is not legally compliant.

Unsound.

The roads surrounding Epping South are subject to congestion. At para 4.160 the area of Bell

Common is subject to an Air Quality Management Area (AQMA) this is in place until 2020. This area will be used as the route for southbound traffic into Epping Forest. There is no alternative. Any new road scheme will only block road back into Epping and Bell Common as the roads will remain the same width in the forest.

Policies

Policy DM 9 High Quality Design. How is this being judged? So how can we comment? Who will sit on the panel? Unsound.

Policy DM 21 Local environmental impacts, pollution and land contamination. A. "The Council will require that the residual local environmental impacts of all development proposals after mitigation do not lead to unacceptable impacts on the health, safety, wellbeing and amenity of existing and new users or occupiers of the development site, or the surrounding land. These potential impacts can include, but are not limited to, air and water (surface and groundwater) pollution, dust, noise, vibration, light pollution, odours, and fumes as well as land contamination." This is **unsound** as there will be major issues from South Epping Masterplan Area. These cannot be mitigated due to its location, topography and size.

Policy DM 22 Air Quality. Impossible to even maintain as with the proposed increased numbers of cars and building 950+ homes adjacent to an 8 lane motorway - M25.

Policy E 4 Visitor Economy. This will not work if we do not have parking in our town.

Policy P 1 Epping

South Epping Masterplan Area J. Development proposals - these are not specific and could not be judged by any of the accessible (public venues) supplied hard copy evidence. Much of the infrastructure is unlikely to be economic for any developer to supply. The other providers do not have an obligation to support this venture.

Air quality is already poor (AQMA for the Bell Common) much more traffic will pass being generated by the **minimum** 950 homes (page 29 stated in Appendix Six). This will inevitably deteriorate with more homes and traffic. This will be contrary to policy DM22 Air quality.

We have an acknowledged lack of parking in town. The South Epping site is unsustainable. Due to the distance from schools, shops, surgeries, post office etc and the steep hill that residents will expected to walk or cycle.

Policy DM 15 - The whole site has a long history of flooding. The brook of Brook Road actually runs into the middle of EPP.R2 the central area is water logged for long periods of time.

SP 2 Spatial Development Strategy 2011-2033

Policy SP 4 Development & Delivery of Garden Communities in the Harlow and Gilston Garden Town. This policy was not consulted upon in the 2016 draft plan. The idea of creating a Garden Village at Gilston has been introduced since the Draft and has not been consulted on. These sites are 3 miles from Epping town Centre and will have a minimum of 3,000 homes. These numbers will have a major impact on congestion and infrastructure. Therefore it is unsound.

Policy T 1 Sustainable Transport Choices. This does not show any increase in the running of the Tube. There is no mention of a 'park and ride' Even in the short term this is essential during development of the car parks. We have vast numbers of commuters in the town. No suggestions have been made how to discourage these from of residential and through roads.

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 have been involved and engaged since the start of the process. This has taken many hours of study and discussion on my part. To expect any reasonable alternatives with the policy of

development for a perceived increase in housing requirements is unreasonable. Especially as reaching the submission version it has actually taken 8 years.

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~~ **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:

Yes / ~~No~~

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?

No

Signature:

Date: 29th January 2017