



**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)

CPRE Essex

Tel/Fax: [REDACTED]

Email: [REDACTED]

December 2017

2. Personal Details

Mrs Patricia Moxey
Vice Chairman, CPRE Essex

[REDACTED]
[REDACTED]
[REDACTED]
Tel/Fax: [REDACTED]

Email: [REDACTED]

3. Agent's Details (if applicable)

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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

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 Yes duty to co-operate 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

CPRE Essex raises concerns about the proposed development referred to as South Epping on sites EPP.R1 Land South of Epping, West – Approximately 450 homes and EPP.R2 Land South of Epping, East – Approximately homes.

The NPPF states that that the construction of new buildings should be regarded as “inappropriate” for the Green Belt. CH 9 89. National planning policy requires that exceptional circumstances are demonstrated to justify an alteration to the Green Belt boundary. The Local Plan Policy as set out in paras 2.133-7 does not justify the developments on Green Belt land which are proposed, and strangely there appears to be no cross reference between this section and Chapter 4 where Green Belt Policy is set out in DM4.

The Prime Minister and other Government Ministers have consistently stated that they will “Protect our precious Green Belt land” and that “The Green Belt is absolutely sacrosanct” and that unmet housing need does not justify building on the Green Belt. This is an example of these promises not being honoured in practice.

This site lies within the Green Belt on agricultural land and has been put forward as a 'sustainable urban extension on the southern edge of Epping, comprising homes, a local centre with facilities and offices, a primary school, facilities, open spaces, play facilities and the necessary supporting infrastructure to:

- a) encourage walking / cycling into Epping and Epping Station, and
- b) a new road connection to the B1393.

Nationally, CPRE advocates a “brownfield first” approach and would therefore wish to be assured that all brownfield land in the District has been identified through the compilation of a Brownfield Land Register in order to avoid necessitating alterations to the boundary of the MGB.

Should the hurdle of inappropriate building in the Green Belt be overcome, then and only then, would this prove acceptable with a Masterplan giving absolute guarantees over the provision of the necessary additional infrastructure as this area as the access roads i.e. Brook Road and Ivy Chimneys Road which are at present prone to considerable traffic congestion.

The developer would have to pay for the necessary required infrastructure such as roads, sewage supply, primary school, medical facilities, open spaces and play area as well as mitigation for flood relief and pollution control through legal agreements.

Retaining the views across the rolling Essex countryside would be vital as these are stunning stretching toward south Essex, the Thames valley and the skyline of London.

This site lies within the Metropolitan Green Belt and is at present agricultural land which should be retained for its prime purpose.

CPRE Essex reiterates that within the Draft Plan itself, there are a number of statements and policies that do not support building on agricultural land:

- Draft Vision for the District (p30) states that by 2033 Epping Forest District will be a place where a more sustainable local economy, including food production, will be developed;
- The Vision for the London, Stansted, Cambridge Corridor Core Area (P26) states that Local Authorities capitalise on existing economic sectors and promote the growth of expanding industries including food production;
- Draft Policy SP 2 - Spatial Development Strategy 2011-2033 (p40) states that the Council will promote support growth in the food production and glasshouse industry;
- Para 4.55 of Draft Policy E 3 -Food Production and Glasshouses - (p68) states that 'following a period of difficult trading conditions the market opportunities for home grown products, together with concern about food security and the widening gap between what the nation produces and requires is leading to renewed aspiration and real opportunities for growth in the sector. The industry appears to have good growth prospects, and food has been agreed as one of the sector priorities for the London-Stansted-Cambridge Corridor.'
- Draft Policy E 4 - The Visitor Economy - (P72) states that Opportunities for sustainable development of the visitor economy will be supported by encouraging local food and produce.
- In terms of Green Infrastructure, the preferred approach under para 4.121 (P86) states that the Draft Local Plan seeks to effectively protect and enhance farmland (for food production) as well as access to and Biodiversity value of agricultural land.'

Since the development of these policies, the uncertainty about the state of agriculture in the UK serves to enhance the value of retaining agricultural land for its prime purpose of food production.

Appendix 1 of the Draft Local Plan identifies that the best and most versatile agricultural land are grades 1, 2 and 3a i.e. it is most flexible, productive and efficient in response to inputs and can best deliver food and non food crops for future generations. The National Planning Policy Framework identifies 'Sustainable' as meaning ensuring that lives for ourselves don't mean worse lives for future generations'. This is clearly recognised in the Draft Local Plan (points above). It is therefore clear that any development needed now to meet the Objectively Assessed Housing Need (i.e. better lives for ourselves) that is built on the best and most versatile agricultural land is not supported by the NPPF as it will mean the ability of future generations to meet their own needs is compromised.

This site is adjacent to the M25 motor way which carries a daily high volume of traffic and there are toxic level pollution along this which will be higher at the nearby M11/M25 interchange. Air quality within Epping town is poor too and the steep incline into Epping from this site means that those who walk or cycle towards the station will be breathing in contaminated air.

It is difficult to see where a new road to link with the B 1393 can be created as the protected land of Epping Fo lies between the proposed development site and any access point onto the B1393.

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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.

This is a non-viable proposal.

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.

(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 at the hearings

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9. If you wish to participate at the hearings, please outline why you consider this to be necessary:

To personally clarify the reasons set out above if the Inspector wishes to raise any queries.

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

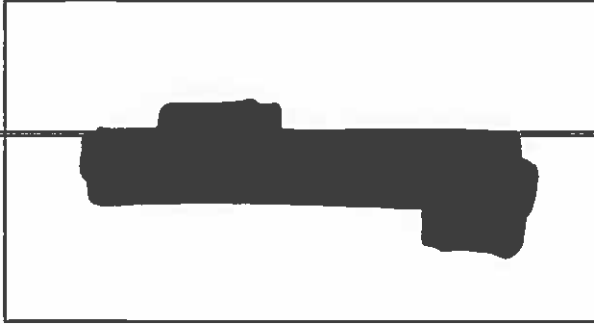
No

11. Have you attached any documents with this representation?

Yes

No

Signature:



28.1.2018

Date:

Empty rectangular box for the date.

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