

Stakeholder Reference: 19RES0585

Document Reference:

Part A

Making representation as Resident or Member of the General Public

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Part B

REPRESENTATION

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

Paragraph: Chapter 5, Policy P 1, paragraph (K), pages 117-18

Policy: P 1 Epping

Policies Map: Yes

Site Reference: EPP.R1

Settlement: Epping

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: Don't Know

Sound: No

If no, then which of the soundness test(s) does it fail? Positively prepared, Effective, Consistent with national policy

Complies with the duty to co-operate? 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.

This response relates to sites EPP.R1 and EPP.R2 - the drop down box above only allowed me to select one site, however I thought it best to cover both sites in the same Representation to avoid repetition, as most of the issues are common to both sites.

The Submission Version of the Local Plan (the "Plan") is unsound for the following reasons:

1. Inconsistent with national policy

- The plan for 950 new homes on green belt land at sites EPP.R1 and EPP.R2 does not comply with section 89 of the National Planning Policy Framework. In particular this section requires that "A local planning authority should regard the construction of new buildings as inappropriate in Green Belt". Section 89 goes on to list some exceptions to this, however none of these exceptions are applicable to the proposed development at sites EPP.R1 and EPP.R2.

- The location of EPP.R1 and EPP.R2 is not in any way conducive to sustainable travel modes. Relative to Epping town centre, this site is at the bottom of a long, steep hill which takes 20-25 minutes to walk (and only quite a fit person would embark on this walk). This will mean that residents in EPP.R1 and EPP.R2 will typically use their motor vehicles to travel to the town centre, increasing congestion (on already congested roads) and causing greater pollution and emissions.

In this regard, the Plan therefore does not comply with sections 30 and 35 of the National Planning Policy Framework. Section 30 states that "Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion", while section 35 states that "developments should be located and designed where practical to give priority to pedestrian and cycle movements". In the case of EPP.R1 and EPP.R2, the Plan will in fact have the complete opposite effect, by encouraging motor vehicle use and the consequential greenhouse gas emissions and congestion.

- The existing green belt land at sites EPP.R1 and EPP.R2 provides a healthy (and essential) buffer between the substantial emissions and pollution from the M25 motorway and the residents of Brook Road, Bridge Hill and Ivy Chmineys Road. If this buffer is replaced by 950 homes and various facilities, the consequential emissions will greatly reduce the quality of the air for local residents and create health concerns. That concern is potentially even greater for new residents of sites EPP.R1 and EPP.R2; a recent study provides strong evidence that car emissions stunt lung development in children between the ages of 10 and 18 and found "pronounced deficits" in lung development among children who lived under 500 metres from a motorway. I am staggered that the District Council (or anyone for that matter) considers it a sound idea to create such population density so close to motorway and no less to put a new primary school in the same vicinity (as is proposed in the Plan). Here is a link to a media article regarding this study:

<https://www.theguardian.com/environment/2007/jan/26/pollution.transportintheuk>

This is clearly contrary to section 109 of the National Planning Policy Framework, which states that the planning system should "contribute to and enhance the natural and local

environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution".

- The site at EPP.R1 has a high risk of surface water flooding, according to a Homecheck Professional Flood Report which was undertaken by [redacted] in late 2014 [redacted]. A development of 500 homes on this site is not appropriate and is contrary to section 100 of the National Planning Policy Framework. This section states that "Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk". Clearly this policy has not been followed, because a very large proportion of the new homes proposed for Epping are in a high flood risk area.

2. Not effective

The Plan, as it relates to sites EPP.R1 and EPP.R2 is simply not effective. The introduction of 950 new homes will require a vast range of facilities and infrastructure, some of which are highlighted in paragraph (K) of Policy P 1 in the Plan. In particular this contemplates a new neighbourhood centre, a new primary school, appropriate provision of health facilities, new road access and internal road layout to support a bus corridor and a new vehicular, pedestrian and cycling bridge over the railway line and adequate levels of high quality public open space. It is simply not feasible expect that, in the space available on these sites, all of the above could be built in a sustainable manner while also achieving the Plan's objective of "incorporating an appropriate buffer to protect the amenity of future residents with regards to noise and air quality from the M25".

The proposals in the Plan for sites EPP.R1 and EPP.R2 are ill-conceived and ineffective. This will lead to insufficient facilities and infrastructure on these sites to cope with the population growth and in turn an even greater strain on existing facilities and infrastructure in Epping.

3. Not positively prepared

The Plan, as it relates to sites EPP.R1 and EPP.R2, is not consistent with achieving sustainable development. The roads in Epping are already congested and it is very difficult to park in the town centre. Traffic in and out of the town is very heavy at peak times. The current wait time for a doctor's appointment is 7 weeks (unless it is an emergency) while no dentist in Epping is taking new patients. It is unrealistic to think that the new facilities built as part of the "South Epping Masterplan" will be able to accommodate all of the needs of 950 new homes in EPP.R1 and EPP.R2 therefore there will be an inevitable pressure on an already congested road network and stretched health and other facilities.

Building on green belt land is also not a sustainable long term development measure. This not only deprives future generations of the use and benefits of the green belt land, but also cuts across the very purpose of the green belt in the first place, namely to prevent an unbroken urban sprawl. Once the green belt is permitted to be eroded in this fashion, it will

be far easier for future development plans to repeat the measure, until eventually the concept of green belt land will not exist. The green belt must therefore be maintained as an absolute priority, consistent with section 89 of the National Planning Policy Framework.

Please set out what change(s) you consider necessary to make the Pre Submission 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 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 Local Plan will not in my view be sound if it makes any provision for building on the green belt land at sites EPP.R1 and EPP.R2. There is no overwhelming need to compromise the green belt in this instance and to do so would clearly contravene the National Planning Policy Framework. In terms of sites EPP.R1 and EPP.R2, the Plan would only be made sound by removing these sites altogether and not undertaking any development on them.

If development will nevertheless occur on sites EPP.R1 and EPP.R2, it should be reduced significantly from the levels set out in the Plan. An aggregate of 950 homes is an ill conceived proposal. The 2016 Draft Local Plan provided for 244 homes on the site which is now EPP.R1 and 255 homes on the site which is now EPP.R2. This number of homes was already too high to be considered sound, however the Plan contemplates more than double this number of homes in EPP.R1 and approximately 200 additional homes in EPP.R2. The proposed number of new homes in the 2016 Draft Local Plan was the subject of much opposition in consultation, yet somehow this has been ignored or overlooked in the preparation of the Plan.

Accordingly, at the very least, the Plan should be amended to reduce the number of homes on sites EPP.R1 and EPP.R2 to a level which is materially less than the levels proposed in the 2016 Draft Local Plan.

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 oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination

Yes

Signature: Daniel Smith Date: 24/01/2018