

Stakeholder Reference: 19RES0600

Document Reference:

## Part A

### Making representation as Resident or Member of the General Public

Personal Details	Agent's Details (if applicable)
Title	Mr
First Name	Philip
Last Name	Clark
Job Title (where relevant)	
Organisation (where relevant)	
Address	, ,
Post Code	
Telephone Number	
E-mail Address	

## Part B

### REPRESENTATION

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

Paragraph: 5.8 to 5.23

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: Yes

Sound: No

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

Complies with the duty to co-operate? Yes

**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.**

According to The National Planning Policy Framework paragraph 182: "A local planning authority should submit a plan for examination which it considers is "sound" - namely that it is:

? Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development

? Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence

? Effective - the plan should be deliverable over its period and based on effective joint working on crossboundary strategic priorities"

? Consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework"

Founded on the above definitions, I believe that the Submission Version of the Local Plan is NOT Sound, is NOT justified, is NOT effective and is NOT consistent with national policy based on the following:

? The proposed development sites have multiple land owners, therefore it will manifest itself in increased costs and time to deliver the project - not effective, not justified

? The Eastern (EPP.R2) plot is separated from Western (EPP.R1) plot by the London Underground Central Line track, therefore joining these two plots together will require significant consultation and negotiation with TfL. This will increase costs such as design time and delivery of the project - Not effective, not justified

? The Eastern (EPP.R2) plot is separated from Western (EPP.R1) plot by London Underground Central Line track, therefore joining these two plots together will be very expensive, as a new passageway will need to incorporate a pedestrian, cycling and car/bus corridor. This will increase costs such as; design time, project delivery as well as decrease the amount of the land available for actual housing - Not effective, not justified

? The new development (EPP.R1+EPP.R2) position requires uphill travel and is a significant distance:

- from Epping train station
- from Epping High Street - Shops, library, sport centre, churches, children's centre etc.

These factors will make the development heavily car reliant to access the above amenities, therefore it will increase air pollution and noise pollution, which will have a damaging effect on the health and wellbeing of current and "new" Epping residents - Not justified, not consistent with national policy.

? The New development will include a minimum of 950 homes, which potentially means introducing a similar amount of vehicles into an already insufficient traffic infrastructure. Therefore, it will increase the strain on neighbouring existing roads like Brook Road, Bridge Hill, Sunnyside Road etc. These roads are currently affected by heavy traffic, as they are used to bypass certain areas and are also utilised as commuter parking areas, which reduces available road space. The presence of the London Underground overbridge at Bridge Hill and a lack of excess land means existing roads are unable to be widened to incorporate additional vehicles - Not justified, not efficient, not consistent with national policy, not positively prepared.

? The New development will include a min. 950 homes. That means introducing potentially

the same number of vehicles. With the potential development to include a health hub/ school/ shops etc. further parking facilities will be required to make these elements functional, which will decrease the amount of land available for actual housing - Not justified

? The position of the New development will encourage car usage. In conjunction with the amount of additional vehicles (potentially 1,000) the Local Plan is to dramatically reduce the amount of parking spaces (EPP.R3, EPP.R7, EPP.R6). This will result in significant parking along roads and on pavements. That will make Epping not pedestrian/ pushchair/wheelchair friendly and creates a need for redesigning and reinforcing pavements, so they can withstand car loading, which will be costly - Not justified, not efficient, not consistent with national policy, not positively prepared.

? The Local Plans recognise that the current population is growing older and this trend will continue for the next 33 years. However, the new development requires uphill travel and is a greater distance from Epping train station and Epping High Street. This will potentially isolate older, less able members of the community. Therefore, it will have a damaging effect on the health and wellbeing of aging residents - Not justified, not consistent with national policy.

? The New development will be positioned in close proximity to the M25. It will include a min. 950 homes, which means potentially introducing a min. of 1,900 people (assuming 2 people per locum) to close proximity of the motorway. It will expose 'new' residents to harmful CO<sub>2</sub>, NO<sub>2</sub> and particulate matter, as well as constant noise ( the motorway is functional 24/7). Therefore, that will have a negative effect on the health and well-being these people. In addition, it will post future unnecessary strain on the NHS services to deal with breathing illnesses, hearing issues etc. - Not justified, not efficient, not consistent with national policy, not positively prepared.

? By introducing a min. 950 homes in the area, there is a need to re-locate the existing Ivy Chimneys primary school to accommodate new children. The position of the school will be within the new development. Therefore, it will be positioned in close proximity to the M25. It will expose children, the future generation, to harmful CO<sub>2</sub>, NO<sub>2</sub> and particulate matter, as well as constant noise - Not justified, not efficient, not consistent with national policy, not positively prepared.

? The New development will be positioned in close proximity to high voltage cables. Therefore, it will expose 'new' residents to electromagnetic radiation. Therefore, that will have a negative effect on the health and well-being of these people. In addition, it will pose future unnecessary strain on the NHS services to deal with health issues. - Not justified, not efficient, not consistent with national policy, not positively prepared.

? The position of the new school will be in close proximity to high voltage cables. Therefore, it will expose children, the future generation, to electromagnetic radiation. Therefore, this will have a negative effect on the health and well-being of children. - Not justified, not efficient, not consistent with national policy, not positively prepared.

? The New Development will be positioned in the Green Belt. The Green Belt has significant value to current local residents, as it shields from the harmful effects of the M25. Developing this land will have a negative effect on quality of life and general wellbeing of local residents. - Not justified.

? The New Development will have a negative effect on the quality of life and wellbeing of local residents during the construction phase, which will likely take many years and will be carried out during night to mitigate the impact on the Central Line, while construction to the

link between the Eastern and Western part of the development is undertaken. In addition, it will impose a risk to school children, as the roads will be heavily used by large construction vehicles - Not justified.

? The New development requires uphill travel and is a significant distance Epping train station and the Epping High Street. This will make the development heavily car reliant. There is poor public transport from this part of town to the centre of Epping - Not justified, not consistent with national policy.

? The New development will include a min. 950 homes (min. 1,900 people). Based on Local plans, the current existing sport centre (EPP.R5) and library (EPP.R11) have been marked for residential development. Relocating these services away from the centre of Epping will increase the need for car use as well as create a negative impact on the growing community. By removing and restricting access to these services. Epping might lose its 'Family/community friendly' status - Not justified, not consistent with national policy, not positively prepared.

? The New development will include a min. 950 homes (min. 1900 people). As Epping has no Police Station, there is a question of how the security and safety of new and existing residents will be managed, especially at the new development where there will be a dramatic increase in population on a relatively small piece of land - Not justified, not consistent with national policy, not positively prepared.

**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.**

I do not have full access to the District Council database etc. I also don't have the time to come up with changes that will make the Submission Version of the local Plan for Epping sound. In my view, the current Plan fails on too many levels that can be saved by a quick few suggestions. The current Local Plan for Epping is not a realistic or a sustainable plan for the next 15 years. It is full of contradictions and it feels like no thought has been put into the assessment of the long and short-term impact of the New development on the Epping.

**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:**

## REPRESENTATION

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

Paragraph: 5.8 to 5.23

Policy: P 1 Epping

Policies Map: Yes

Site Reference: EPP.R2

Settlement: Epping

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

Legally compliant: Yes

Sound: No

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

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**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: Philip Clark Date: 28/01/2018