Stakeholder Reference:
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	Darvinder	
Last Name	Singh	
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:
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,Justified,Consistent with national policy
Complies with the duty to co-operate? No

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.

The South Epping Masterplan (sites EPP.R1 and EPP.R2) fails the test of soundness and meets the test of Wednesbury unreasonableness.

The proposal is unsound as it can not be justified in accordance with the National Planning Policy Framework as it is not the most appropriate strategy when considered against the reasonable alternatives.

Alternative sites such as the East Epping Masterplan and the North Weald Golf Course contain key infrastructure in their proposals (Primary School, GP Surgery, retail facilities), have better transport links (proximity to public transport, existing roads) and benefit from single or dual site ownership.

The proposal meets the test in Associated Provincial Picture Houses Ltd v Wednesbury Corporation (1948) 1 KB 223 as being unreasonable as no reasonable person could have come to this conclusion.

A reasonable person would not propose building 950 dwellings next to the M25, with a need to build a relief road underneath the Central Line, a new uncosted relief road (due to the lack of capacity on Ivy Chimneys Road which is single track in places) on green belt land that constitutes a buffer to the neighbouring settlement of Theydon Bois, with multiple landowners on topography liable to flooding.

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.

Alternative sites exist which would cost a fraction of the cost to develop which would enable the greater provision of affordable housing and better air quality for residents and reduced car traffic due to the accessibility of public transport

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: Darvinder Singh Date: 2018-01-29