

REPRESENTATION



Mrs L Sullivan

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28 January 2018

Local Plan Regulation 19 Representation
Planning Policy Team
Epping Forest District Council (EFDC)
Civic Offices
323 High Street
Epping
Essex CM16 4BZ

Dear Sir/Madam,

In response to the Epping Forest District Council's (EFDC) invitation for representation on the 'soundness' and 'legal compliance' of the Submission Version of the Local Plan, I would like to submit the following comments, as opposed to completing this request/the forms online. I understand that representations should be related to whether or not the Plan has been prepared in accordance with the relevant legal requirements, and whether or not the Plan is sound (positively prepared, justified, effective and consistent with national policy). [Redacted]Redacted.....
[Redacted]

REPRESENTATION (as a resident of Epping)

Overall, I contend that the proposed EFDC Local Plan (specifically EPP.R1 and EPP.R2) is fundamentally unsound and cannot be justified. It should therefore be rejected.

In summary, this plan:

- Is not consistent with national policy;
- The Green Belt - not shown Exceptional Circumstances. Exceptional needs to be shown for each and every site; and



- There has been a failure to consider all other alternatives, specifically greater densification including in adjacent Local Planning Authority areas.

Failed duty to cooperate. For example:

- The Strategic Housing Market Assessment did not include all the ideal LPAs as Broxbourne pulled out;
- Cooperation should have included comparison of development densities in adjacent LPSs and the Strategic Housing Market Assessment members to decide where development should be intensified;
- No consultation on garden villages; and
- DCLA Minister's letter 21 July 2015 "Each local planning authority should produce a Local Plan for its area, and in doing so should proactively engage a wide section of the community so that Local Plans, as far as possible, reflect a collective vision for areas." It is hard to see where any of the draft plan's feedback from the community has been reflected in the latest plan. In addition, releasing the submission version and inviting representation just before Christmas does seem ill timed and not welcoming of a collective vision for Epping.

Not legally compliant, including:

- Consultation with the public has not been meaningful;
- Need examples from 2012, 2016 responses which have not been followed through;
- No consultation on infrastructure because there was almost nothing included in the 2016 draft Local Plan;
- Consultation under section 19 has been invalid in view of the failure to provide information on a timely manner, failure to advertise the project and omission of meaningful infrastructure commitments from other authorities; and
- No Masterplan to support the Epping South or Gilston proposals.

Not sustainable, namely due to lack of infrastructure (as outlined in many responses to the draft plan in 2016) and not adequately addressed in the latest plan

Lacks internal consistency

- Building multi-storey buildings near the town centre is not consistent with the market town image proclaimed as the objective for Epping (where stated); and
- Large housing development on the edge of the town outside walking distance, with no frequent bus service, requires more town centre parking, which is not proposed (instead the main existing car parks are proposed to be new housing sites).

Statement of Community Involvement

The Council are meant to have involved the public closely at all stages. It is my belief they have failed because:

- Responses to previous consultations seem not to have had much effect on the later plans;
- There has been no meaningful advertising of the current consultation (in fact I only became aware of the latest plan from a Liberal Democrats flyer, received recently);



- Paper copies of the current Local Plan were not available to buy for home use until after the New Year break (so residents lost two out of six weeks);
- Copies which have been placed in libraries are not always on display and there is no advertising of them; and
- The published documents continue to exclude key information on the decisions taken and choices made by the Council.Redacted.....

Epping South

- Air quality which may be expected to deteriorate with more homes and more traffic and an ever-busier motorway adjacent to the site;
- Local and commuter transport heavily impacted and there is a lack of parking in town (with even less to be available under this plan);
- Unsustainable due to distance from existing schools, shops, surgeries, post office. Furthermore, there is no real proposal as to how the existing heavily oversubscribed services will be able to cope with so many more residents;
- History of flooding; and
- Fundamentally insufficient road access for existing local residents, let alone 950 new homes.

There are two obvious, large sites that exist and are available which are referenced on the next page. I believe that such sites are more appropriate, sustainable and economically viable than that proposed for Epping South. They were submitted to EFDC, but do not appear in the Final Plan and the question is why are they no longer in the plan? I understand that developers already have detailed plans for these two sites and that other sites may also be available. Theydon Bois has been allocated just 58 houses in the Local Plan and could easily take additional housing to the east. All houses would be within easy walking distance of Theydon Bois tube station. A truly sustainable development promoting walking and cycling to the village. Eleanor Laing MP for Epping Forest says: "You mention the number of dwellings suggested for Theydon Bois. Just for the record, my personal opinion is that Theydon Bois could take rather more than the number of dwellings suggested in the current plan".

To conclude: The Submission Version of the Local Plan, specifically for South Epping, does not meet the test of the plan as being justified and is therefore unsound. EFDC should be following an evidence-based approach and it is difficult to see where this is demonstrated in the plan. Therefore, the EFDC Local Plan should be rejected, or major amendments (to include developments such as those outlined on the next page) should be made. Development should be removed entirely from south Epping and re-allocated to viable sites. I understand appropriate, alternative "out of the box" and fully costed developments have been proposed to provide housing and associated infrastructure.

Yours sincerely,

Mrs L Sullivan



See the table below for a comparative analysis of South Epping versus two alternative sites suggested:

	South Epping	East Epping	North Weald Golf Course Development
Site Constraints	<p>Many, including:</p> <ul style="list-style-type: none"> • <i>Mitigation of air and noise pollution from the M25</i> • <i>Presence of High Voltage Pylons</i> • <i>Ancient woodland</i> • <i>BAP Habitat</i> • <i>Very poor topography for building</i> 	None	None
Sustainability	<p>Unsustainable</p> <p><i>Long distance from Tube Station and Epping Shops which are all uphill. Walking or cycling would be an impossibility, resulting in an increase of car usage and local traffic, both of which will be difficult to facilitate with the existing Epping infrastructure</i></p>	<p>Sustainable</p> <p><i>Within walking distance of Tube station and Epping Shops. Walking and cycling can be promoted</i></p>	<p>Sustainable</p> <p><i>Linked to major roads (A414/M11)</i></p>
Infrastructure Requirements	<p>Many</p> <p><i>A relief road over or under the Central Line is expected to cost at least £8-£10 million. Additional costly junctions at either end of the new road</i></p>	None	None
Risk of Removing from Green Belt	High	Moderate/Low	<p>Low</p> <p><i>This site is not agricultural and therefore is sequentially preferable for development compared to other sites</i></p>
Land Assembly	<p>Difficult delivery</p> <p><i>Six separate landowners and not promoted as a cohesive development</i></p>	<p>Easier delivery</p> <p><i>Two landowners working together with an established Developer</i></p>	<p>Delivery straight forward</p> <p><i>One landowner working with an established Developer</i></p>



Access and Highways	<i>Existing roads are already at capacity. Brook Road and Ivy Chimneys Road are single track in places. Single-track access to proposed site through Flux's Lane</i>	<i>Existing wide roads (Stonards Hill and Stewards Green Road) can be used to access the site</i>	<i>Linked to major roads (A414/M11). Traffic from this development would not pass through the bottleneck of Epping</i>
Development Benefits	<i>No guarantee that key infrastructure will be delivered. There are no tangible development plans proposed to date, just a lot of suggestions of what could be but without a solid plan how are the residents really expected to make informed decisions on the local plan</i>	<i>A school, GP Surgery, leisure and retail facilities all costed as part of the development</i>	<i>A school, GP Surgery, leisure and retail facilities all costed as part of the development</i>

