

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	Richard	
Last Name	Irish	
Job Title (where relevant)		
Organisation (where relevant)		
Address	.....Redacted.....	
Post Code		
Telephone Number	.....Redacted.....	
E-mail Address	.....Redacted.....	

---

**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: No

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? Effective, Justified

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.**

1. Site Constraint. Noise and air pollution would need to be mitigated as the proposed site is next to the busiest road in the country. To mitigate pollution, huge barriers would need to be built next to the raised section of a motorway to protect future residents. The site contains high voltage cables/pylons. The site contains oil pipelines. The site has Tree Preservation Orders (TPOs). The area has ancient woodland. The site contains BAP habitat (defined as "an area under threat requiring conservation action").

2. Sustainability of location. The result will be a huge increase in local traffic on what are already very congested roads. Ivy Chimneys, Bridge Hill and Brook Road experience excessive levels of through traffic and school traffic on a daily basis. The addition of 950+ homes beggars belief as to how those roads would handle, firstly the construction traffic, then the additional traffic caused by occupiers of the built homes. The wear and tear will also increase exponentially (e.g. see the top of Ivy Chimneys Road where there is currently multiple potholes!).

3. Infrastructure Requirements. This development will require some sort of relief road over/under the Central Line, which presumably would cost multiple millions of pounds. This money should be saved and spent on essential infrastructure around Epping (e.g. healthcare, policing, roads). Working with TFL would be an extreme challenge while this big civil engineering project is being undertaken.

4. Removal of Green Belt south of Epping would be "High Risk". Other potential sites (eg east of the Orchards/North Weald Golf Course) is Low or Medium Risk.

5. Land Assembly. There are six separate landowners of land in south Epping which means that the land has not been promoted as a single cohesive development.

6. Access and highways. Brook Road/Ivy Chimneys Road/Bridge Hill are single track in places and cannot take any increase in traffic. It would be impossible for construction traffic to use them. There is no obvious access to the western parcel. Very restricted access to the eastern parcel via Flux's Lane.

7. Development Benefits. Alternative sites already include key infrastructure in their proposals (Primary School, GP Surgery, Leisure facilities etc). There is nothing guaranteed for south Epping in the Local Plan.

**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.**

There are two very obvious, large sites that exist and are available. They are more appropriate, sustainable, and economically viable, but currently not in the Local Plan. These are namely land East of the Orchards and North Weald Golf Course - sites that currently have land owners/developers interested and keen to build.

Also Theydon Bois has been allocated just 58 houses in the Local Plan and could easily take a 500-1000 houses to the east. All within walking distance of the tube station.

**If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

Yes, I wish to participate at the oral part of the oral examination

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

So that the voice of local residents is heard.

## REPRESENTATION

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

Paragraph:

Policy: P 1 Epping

Policies Map: No

Site Reference: EPP.R2

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? Effective, Justified

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.**

1. Site Constraint. Noise and air pollution would need to be mitigated as the proposed site is next to the busiest road in the country. To mitigate pollution, huge barriers would need to be built next to the raised section of a motorway to protect future residents. The site contains high voltage cables/pylons. The site contains oil pipelines. The site has Tree Preservation Orders (TPOs). The area has ancient woodland. The site contains BAP habitat (defined as "an area under threat requiring conservation action").

2. Sustainability of location. The result will be a huge increase in local traffic on what are already very congested roads. Ivy Chimneys, Bridge Hill and Brook Road experience excessive levels of through traffic and school traffic on a daily basis. The addition of 950+ homes beggars belief as to how those roads would handle, firstly the construction traffic, then the additional traffic caused by occupiers of the built homes. The wear and tear will also increase exponentially (e.g. see the top of Ivy Chimneys Road where there is currently multiple potholes!).

3. Infrastructure Requirements. This development will require some sort of relief road over/under the Central Line, which presumably would cost multiple millions of pounds. This money should be saved and spent on essential infrastructure around Epping (e.g. healthcare, policing, roads). Working with TFL would be an extreme challenge while this big civil engineering project is being undertaken.

4. Removal of Green Belt south of Epping would be "High Risk". Other potential sites (eg east of the Orchards/North Weald Golf Course) is Low or Medium Risk.

5. Land Assembly. There are six separate landowners of land in south Epping which means that the land has not been promoted as a single cohesive development.

6. Access and highways. Brook Road/Ivy Chimneys Road/Bridge Hill are single track in places and cannot take any increase in traffic. It would be impossible for construction traffic to use them. There is no obvious access to the western parcel. Very restricted access to the eastern parcel via Flux's Lane.

7. Development Benefits. Alternative sites already include key infrastructure in their proposals (Primary School, GP Surgery, Leisure facilities etc). There is nothing guaranteed for south Epping in the Local Plan.

**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.**

There are two very obvious, large sites that exist and are available. They are more appropriate, sustainable, and economically viable, but currently not in the Local Plan. These are namely land East of the Orchards and North Weald Golf Course - sites that currently have land owners/developers interested and keen to build.

Also Theydon Bois has been allocated just 58 houses in the Local Plan and could easily take a 500-1000 houses to the east. All within walking distance of the tube station.

**If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

Yes, I wish to participate at the oral part of the oral examination

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

So that the voice of local residents is properly heard.

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

Yes

Signature: Richard Irish Date: 28/01/2018