

REPRESENTATION

I contend that the proposed "South Epping Masterplan" (EPP.R1 and EPP.R2) is fundamentally unsound and cannot be justified. It should therefore be rejected.

I am making this representation as: a resident

Title: Mr & Mrs

First Name: Adam & Sophie

Last Name: Martin

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The Local Plan can only fail if it can be proven to be unsound. A Local Plan can only be considered "sound" if it can be "justified". The National Planning Policy Framework (NPPF) requires that:

"for a plan to be justified, it should be "the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence".

The South Epping Masterplan fails crucial tests of soundness

27th January 2018

Dear Sir/Madam,

Epping Forest Local Plan -Policy SP 2

(i) EPP.R1 Land South of Epping, West – Approximately 450 homes

(ii) EPP.R2 Land South of Epping, East – Approximately 500 homes

I am writing to express my concerns around the proposed development EFDC voted through the amended Local Plan through in mid-December. In particular the doubling of the number of proposed houses south of Brook Road from 245 to 500 and the 450 houses proposed south of Ivy Chimneys Road.

The proposal destroys prime green belt and will place a huge number of houses next to the busiest road in the country. Not to mention the cost of going over/under the Central Line with a relief road is now projected to be £10million. It is not a logical place to build and it makes no economic sense.

I believe the plans for much of the development in Epping fails the tests of soundness required, and I believe the South Epping element is particularly flawed. The South Epping masterplan does not meet the test of the plan as being justified, and is therefore unsound. EFDC should be following an evidence-based approach and they have utterly failed to demonstrate this.

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").

The Council retains one small AQMA for the Bell Common junction, which remains above the $40\mu\text{g}/\text{m}^3$. This junction would be put under increased pressure during development and also on completion of developments. As I will go on to point out development here will require car use because of the topography and location to amenities. Please see fig.1 at the end of this letter which is taken from the 2016 Air Quality Annual Status Report (ASR) and shows Epping Bell Vue (Bell Common) to be in excess of the recommendations in each year I am able to find information from 2011 and in many years significantly over the $40\mu\text{g}/\text{m}^3$.

"Because the single largest influence on air quality in the District is the motor car, the Council is generally reliant on national strategies and vehicle emissions regulations for the improvement of air quality" – South Epping appears to not meet that criteria.

As detailed in Policy Guidance LAQM.PG16 (Chapter 7), local authorities are expected to work towards reducing emissions and/or concentrations of PM2.5 (particulate matter with an aerodynamic diameter of $2.5\mu\text{m}$ or less). There is clear evidence that PM2.5 has a significant impact on human health, including premature mortality, allergic reactions, and cardiovascular diseases.

What might happen should the M25 need to be widened again in the future – what impact would the M25 continuing it's trend of getting busier would that have on the health of residents moving to a South Epping development and would it therefore be a viable project for developers.

2. Sustainability of location. The proposed development would be far from the tube station, high street shops, doctor's surgeries and St Johns Senior School. The result will be a huge increase in local traffic as it would be an impossibility to walk or cycle uphill to Epping from this location for most people.

3. Infrastructure Requirements. Requires a relief road over/under the Central Line at a cost estimated of £10million. This money should be saved and spent on essential

infrastructure. Working with TFL would be an extreme challenge while this big civil engineering project is being undertaken and I would assume could include a closure of the Central Line to allow for works to be completed. Moving the station to a point further along the line will also cause massive issues within the community. Most people in Epping are currently able to walk to the station and bought houses for this very reason, moving the station would cause these people the inconvenience of no longer being able to walk which would in turn mean more traffic.

4. Removal of Green Belt South of Epping would be "High Risk". Other potential sites (e.g. East of the Orchards/North Weald Golf Course) are considered Low or Medium Risk. These sites were removed from the plans without any reasons given as far as I can see as a local resident. EFDC risk multiple Judicial Reviews if changes to any Green Belt boundaries are made to accommodate unsubstantiated housing 'need' as this will be clearly contrary to NPPF as no very special circumstances exist. Housing need does not constitute very special circumstances. Our very own Prime Minister expressed this very view in the Houses of Parliament very recently. Historic figures for growth in the district projected forward show nothing like the amount of housing 'need' the Council are foisting upon the district and its future generations. EFDC need to responsibly protect the environment of the district. Everyone will feel the ill effects of this over-development of the district and permanent loss of Green Belt.

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 are single track in places and cannot take any increase in traffic. It would be impossible for construction traffic to use them without causing huge traffic issues and severe jams. There is also a low bridge in this area which already creates a very dangerous junction where many school children pass on their way to Ivy Chimneys Primary School. There is no obvious access to the western parcel. There is very restricted access to the eastern parcel via Flux's Lane and is situated in parts unmaintained road surfaces.

7. Ivy Chimneys/Bridge Hill Traffic and Parking. As a resident of Ivy Chimneys Road I see at first hand the chaos the road causes on a daily basis due to the extremely high levels of traffic and parking. **...Redacted...** Every day we are forced to walk out into the (very busy!) road to get passed parked cars blocking the pavements (see photos attached), which is highly dangerous and scary! The traffic comes to a standstill due to the road being narrow in parts and not allowing two cars to pass at the same point causing very long traffic jams and irritated drivers. I have also experienced many near misses when cars have mounted the narrow pavements to get passed other cars **...Redacted...** Part of this problem is also caused by the fact that there are no sufficient curbs in place on Ivy Chimneys Road which makes it easy for cars to mount the pavement driving towards parents walking their young children to school. This is not acceptable under any

circumstances and if no money is being invested in revising this area as it is with the current traffic flow, then an increase in traffic flow will surely end with a fatality.

8. 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. All of the listed facilities are already highly stretched for the current numbers living in Epping and simply cannot accommodate anymore residents.

Alternative Options

There are two 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 500-1000 houses to the east. All within walking distance of the tube station. Though for no known reasons again these areas or sites have been dropped.

Thornwood is also another area that could be developed and has plenty of land which could be used for a large number of houses to be erected. Has consideration also been given to a 'park and ride' from North Weald/Thornwood to cater for people wanting to commute from Epping without somewhere to park their vehicle?

There is strong local feeling that it is important good valid reasons against the alternatives should be published before any plan including the less viable sites is granted. These decisions will affect peoples lives for generations and change the local environment forever and seem to be ill considered.

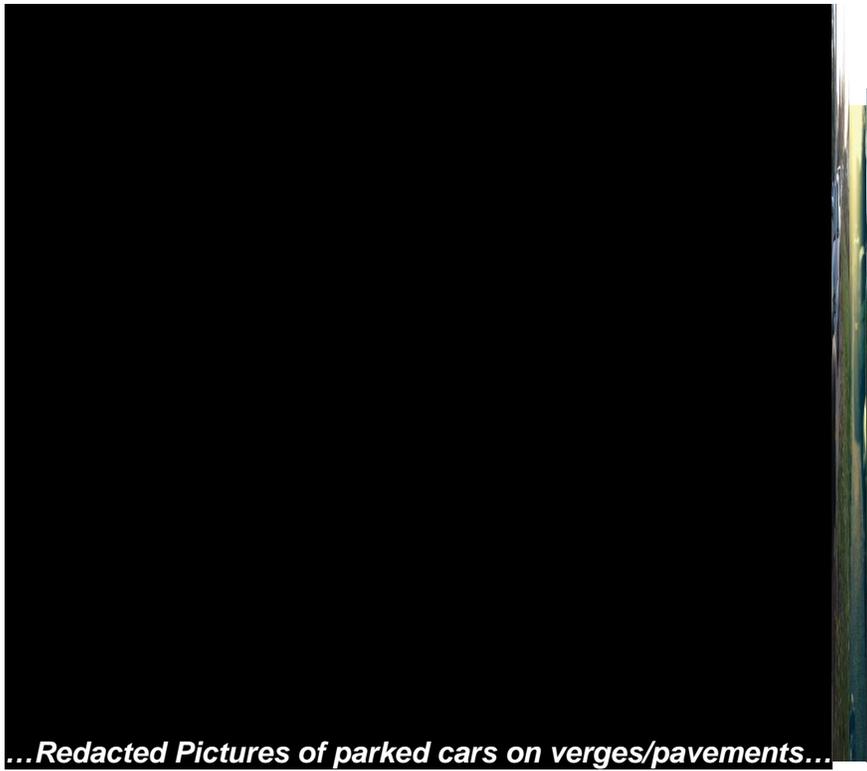
Sophie & Adam Martin

...Redacted...

Fig 1.

Table A.2 – Annual Mean NO₂ Monitoring Results

Site Name	Site Type	Monitoring Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2015 (%) ⁽²⁾	NO ₂ Annual Mean Concentration (µg/m ³) ⁽³⁾				
					2011	2012	2013	2014	2015
Chigwell: Hainault Road	Kerbside triplicate	Diffusion tube	97.2%	75%	35	34	36	35	39
Epping: 15 High Street	Urban Background triplicate	Diffusion tube	100%	75%	28	30	30	31	25
Epping: Bell Vue	Roadside triplicate	Diffusion tube	100%	75%	<u>64</u>	57	<u>65</u>	<u>63</u>	42
Epping: Ladbrokes	Roadside triplicate	Diffusion tube	100%	75%	37	38	35	36	34
Epping: Superdrug	Roadside triplicate	Diffusion tube	100%	75%	39	43	43	42	36
Hastingwood: Canes Cottages	Urban Background triplicate	Diffusion tube	100%	75%	27	28	28	26	16
Loughton: 2 Church Hill	Roadside co-location	Diffusion tube	100%	75%	36	38	38	35	28



...Redacted Pictures of parked cars on verges/pavements...