



**Representation form for Submission Version of the Epping Forest District Local Plan
2011-2033 (Regulation 19 publication)**

This form should be used to make representations on the Submission Version of the Epping Forest District Local Plan which has been published. Please complete and return by 29 January 2018 at 5pm. An electronic version of the form is available at <http://www.efdclocalplan.org/>

Please refer to the guidance notes available before completing this form.

Please return any representations to: Planning Policy, Epping Forest District Council, Civic Offices, 323 High Street, Epping, Essex, CM16 4BZ

Or email them to: LDFconsult@eppingforestdc.gov.uk

BY 5pm on 29 January 2018

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Please attach any documents you wish to submit with your representation

Part A

1. Are you making this representation as? (Please tick as appropriate)

a) Resident or Member of the General Public or

b) Statutory Consultee, Local Authority or Town and Parish Council or

c) Landowner or

d) Agent

Other organisation (please specify)

2. Personal Details**3. Agent's Details (if applicable)**

Title	MS	
First Name	ANN	
Last Name	LEDDRA	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3		
Line 4		
Post Code	[REDACTED]	
Telephone Number	[REDACTED]	
E-mail Address	[REDACTED]	

Part B – If necessary please complete a separate Part B form for each representation

**4. To which part of the Submission Version of the Local Plan does this representation relate?
(Please specify where appropriate)**

Paragraph Policy Policies Map

Site Reference Settlement

**5. Do you consider this part of the Submission Version of the Local Plan:
*Please refer to the Guidance notes for an explanation of terms**

- a) Is Legally compliant Yes No
- b) Sound Yes No

If no, then which of the soundness test(s) does it fail*

Positively prepared Effective - see attached

Justified Consistent with national policy

- c) Complies with the duty to co-operate Yes No

6. Please give details 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. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments

see attached

(Continue on a separate sheet if necessary)

7. Please set out what change(s) you consider necessary to make the Submission Version of the 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 Submission Version of 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.

see attached

(Continue on a separate sheet if necessary)

8. 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 the hearings

Yes, I wish to participate at the hearings

9. If you wish to participate at the hearings, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

10. Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination (Please tick)

Yes

No

11. Have you attached any documents with this representation?

Yes

No

Signature:

Date:

29-01-2019

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 proposed development would be far from the tube station, Epping shops 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 distant location.

3. Infrastructure Requirements. Requires a relief road over/under the Central Line at a cost estimated between £8mil-£10mil. Obviously 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.

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 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.

So what reasonable alternatives exist?

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.

To conclude

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.

Therefore the Local Plan should be rejected, or made subject to a major amendments. Development should be removed entirely from south Epping and re-allocated to available, logical, economically viable sites - which do exist in the district.