

Stakeholder Reference:

Document Reference:

Part A

Making representation as Resident or Member of the General Public

Personal Details		Agent's Details (if applicable)
Title		Mrs
First Name		Alexandra
Last Name		Stean
Job Title (where relevant)		
Organisation (where relevant)		
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Part B

REPRESENTATION

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

Paragraph: Policy P1 Epping

Policy: P 1 Epping

Policies Map: Yes

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? 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.

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 reasons for this are:

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. This would be for a distance 1.25km. This has not been costed. 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 topography (particularly to the south of EPP.R2) is hilly and would provide a challenge to build on. The soil is predominantly clay and very boggy. Surface water is often seen. The land opposite Brook Road is at the bottom of a hill and bordered by a brook to the north and south.

2. Sustainability of location. The proposed development would be far from the Epping Tube Station, High Street shops and St John's Senior School. This will result in a huge increase in local traffic as it would be an impossibility to walk or cycle uphill to Epping from this distant location. There is no indication of affordable housing provision levels. Affordable housing has been allocated in alternative sites that are not in the Plan (the "East Epping Masterplan" and North Weald Golf Course). The element of affordable housing in the South Epping Masterplan would be compromised by the high cost of the development. An alternative proposed site (East Epping Masterplan) is at it's closest point is 320m to the main Tube Station entrance and the terrain is flat. The nearest point from the South Epping Masterplan is 785m to the main Tube Station entrance and up a steep hill. The furthest point from the South Epping Masterplan to the main Tube Station entrance is 1.6km.

3. Infrastructure Requirements. The South Epping Masterplan would require a relief road to be built over or under the Central Line at a cost estimated between £8mil-£10mil. Obviously, this money could be saved and spent on infrastructure at an alternative site. Working with TFL would be an extreme challenge while this big civil engineering project is being undertaken. The South Epping Masterplan cannot happen without a new relief road and this implies two additional junctions along Stewards Green Road and at the top of Ivy Chimneys Road. These junctions have also not been costed.

4. Removal of Green Belt. The removal of Green Belt to the south of Epping has been assessed as "High Risk". Other potential sites exist that are Low or Medium Risk to Green

Belt. Land south of Epping is prime Green Belt that acts as a buffer between Epping and the toxic M25. The land is BMV agricultural grade and should not be touched. Wildlife would be wiped out. The removal of the Brook Road playing field deprives children of a place to play.

5. Land Assembly. There are six separate landowners of land in the South Epping Masterplan which means that the land has not been promoted as a single cohesive development. No clear plans exist for the South Epping Masterplan and key infrastructure is aspirational, it is not guaranteed.

Alternative sites (East Epping Masterplan and North Weald Golf Course) have single or dual land ownership with a single developer responsible for delivery of housing and essential infrastructure.

6. Access and Highways. Brook Road and Ivy Chimneys Road are single track in places and cannot take any increase in traffic. There are two Primary Schools locally and an increase in traffic would lead to safety concerns for pupils. It would be impossible for construction traffic to use these existing narrow roads. There is no obvious access to the western parcel. There is very restricted access to the eastern parcel via Flux's Lane, which is single-track road. This narrow road shares access (before the road splits) to Coopersale Hall School. The essential new relief road would have to link Stewards Green Road and the top of Ivy Chimneys Road. Ivy Chimneys is already a bottleneck and there are already long queues for the Bell Common traffic lights. The increase in local traffic at these junctions would exacerbate existing problems.

7. Development Benefits. Alternative sites (East Epping Masterplan and North Weald Golf Course) already include key infrastructure embedded in their proposals (Primary School, GP Surgery, Leisure and Retail facilities etc). There is nothing guaranteed in the South Epping Masterplan in the Local Plan. I have checked the ARUP Infrastructure Delivery document and no plans exist.

8. Crucial Information Missing. Residents have not been given any rationale as to why certain sites were removed from the initial Draft Plan. This vital information has been kept out of the public domain and will not be made available before the representation cut off date of January 29th. This is demonstrably unfair and makes a mockery of any transparency around the planning process. There may also be a basis for a legal challenge on this point.

9. Political Process Rushed. The Final Plan was pushed through without careful analysis of obvious, more appropriate sites. This is because EFDC were worried that they would miss the March 31st dead-line and potentially have to find space for an additional 8,000 houses in the District.

10. Undemocratic Process. The Final Plan removed certain sites from Epping in the Draft Plan. These sites were predominantly to the north of Epping. The allocation to the south of Brook Road, Epping was more than doubled to 500 houses. This was not subject to any public consultation.

11. Building on Green Belt. Can only be done in "exceptional circumstances". Fundamentally the requirement for a District to provide additional housing does not constitute exceptional circumstances when viable alternatives exist eg. North Weald Golf Club. This specific site is not agricultural and therefore is sequentially preferable for development.

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.

Development should be removed from the two proposed areas in South Epping. There should be consideration for alternative sites which would be appropriate, sustainable and economically viable.

The two sites referenced above could provide this alternative (East Epping and North Weald Golfcourse). The attached table shows considerations for each site. 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.

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: Alex Stean Date: 28/01/2018

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