

SUPPLEMENTARY REPRESENTATION

Initial Representation Statement: 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 supplementary representation as: a resident

SIGNED

Title: Mr

First Name: Ian

Last Name: Willcox

23/4/2018

I have read the Epping Forest District Council (EFDC) Site Selection Report.
Ref: EB805P-Appendix-B1.6.6-Results-of-Identifying-Sites-for-Allocation.pdf
This report is so flawed it is hard to know where to start. I will try and be brief.

1. Removal of sites to the north of Epping / Theydon Bois without justification

I can see that 5 large sites have been removed from predominantly the north side of Epping, namely: SR-0071 Stonards Hill (115 houses removed), SR-0208 Theydon Place (66 homes removed), SR-0132ci Lower Bury Lane (49 houses removed), St Margarate's (181 houses removed), SR-1053 Stewards Green Road (305 homes removed)

I was stunned to see that these sites were removed without justification. As an example the report states regarding Stonards Hill: "However, responses received through the Regulation 18 Draft Plan consultation indicated that the site is **less preferred by the community**". There is no other reason.

It is clear that EFDC are not now using an evidence-based approach. This goes against EFDC own guidelines. They are not taking an objective assessment of where is most appropriate to build – but reverting to a competition to see which neighbourhood shouts the loudest. This is an unsound approach and therefore the Local Plan should be thrown out. As further evidence I would point to proposed development east of Theydon Bois (eg SR-0026B and SR-0026C). These sites were removed without any justification. The Report states: "Responses received through the Regulation 18 Draft Local Plan consultation indicated that the site is **less preferred by the community**". Numerous other examples exist.

2. Regarding Land south of Brook Road. (SR-0069/33)

The report states that "...the site was **more preferable in suitability terms** than other sites in Epping which were proposed for allocation in the Draft Local Plan (2016) and which are also located in the Green Belt". However, there is no evidence for suitability.

Land north of Stewards Green Road is suitable from every conceivable angle.

The only justification for 'preferring' to build south of Brook Road is:

"growth to the south of Epping was considered to be more preferable in terms of **landscape sensitivity** and Green Belt harm compared with other strategic options around the settlement".

This is a purely a subjective statement. I would argue that Green Belt creating a buffer between Epping and the M25 is far more precious and sensitive than any of the other sites proposed in the Initial Draft.

Specifically land north of Stewards Green is unremarkable. Land south of Brook Road and north of Stewards Green Road are both agricultural land. Land south of Brook Road is used for dog-walking and for children to play on. Land north of Stewards Green Road is not used by the local community.

3. If there is to be only one “Masterplan” in Epping or Theydon Bois

It would appear EFDC ‘solution’ is to remove a number of suitable sites available in Epping and dump them in one unsuitable “Masterplan”.

The proposed South Epping Masterplan is totally inappropriate. The land adjoins the M25, there will be a £8-£10 mil cost of going over/under the Central Line, on land that floods, with difficult topography, narrow single track roads for access, multiple land-owners, two Primary schools, a high density development that is unsustainable, with multiple land ownership etc etc. There will be a huge cost to provide necessary infrastructure, potentially at the cost of providing social housing. I know that alternative sites exist:

*Stewards Green Road. See previous Representation. Low density, landscaped, sustainable and fully costed development, See Pigeon Developments for detail.

*North Weald Golf Club. See previous Representation. Low density, landscaped, sustainable (linked to A414/M11 so will not affect local traffic volumes) and fully costed development. See Quinn Estates for detail.

*Theydon Bois. Low density, landscaped, sustainable. See CK Properties for detail.

4. EFDC did not make residents aware that Appendix B & C were in the public domain.

When Appendix B & C were finally made available, EFDC **only** wrote to people who had made reference to the missing Appendices in their original representation. Even though I made reference to the missing information I was **not** written to. It was only because I spoke to neighbours that I was aware of this vital information finally being placed in the public domain. This illustrates EFDC wishing to suppress this information. They are clearly lacking transparency in their process. My understanding is that this is a contravention of their legal responsibility and may be subject to a challenge in the Courts. See proof below:

Email from EFDC (March 27th)

“Hi Mr Willcox,

...We can only apologise that you did not receive the email asking for a supplementary representation, and can also confirm that you are able to make a supplementary representation as you noted that the appendices had not been published in your original response.”

And further email (March 28th):

“You are correct that we are **only** seeking supplementary responses from those who raised this as an issue in the original response to the publication (as per the attached letter) which I believe has already been sent to you.

My response

“...given the high level of scrutiny that EFDC are currently under, I would have thought it appropriate to contact every single person who made representations, regardless of content”

EFDC did not respond.

To conclude.

After a long wait for the Site Selection Report – I cannot see any evidence of an evidence-based approach. Simply reverting to “site is less/more preferred by the community” is fundamentally unsound and cannot be justified. Given the lack of evidence in the Site Selection Report – there is a strong suspicion that Appendices B & C were deliberately suppressed. EFDC knew they could not justify their site selection.

Based on an evidence-based approach this Local Plan is fundamentally unsound.

EFDC have clearly not followed the correct legal process.

The Final Plan is a work of incompetence. It must be thrown out.