

## Epping Forest District Local Plan Submission Version 2017 – Supplementary representation

1. This representation is made on behalf of district and town councillor Jon Whitehouse, district councillor Janet Whitehouse, and town councillor Cherry McCredie (representing Epping Hemnall ward). Contact details: 7 St John’s Road, Epping, CM16 5DN ( [REDACTED] jon@jonwhitehouse.org.uk)
2. The representation relates to Appendix B of the Site Selection Report (March 2018), which was not available to councillors or members of the public when the draft submission local plan was considered by Epping Forest District Council in December 2017 or during the subsequent representations period.
3. The publication of the appendix reveals that the site selection process in relation to the South Epping Masterplan area is flawed and unsound. It also shows that sites have been assessed on an inconsistent basis with key pieces of evidence being taken into account for some sites but not others.

**Sites SR-0069 (land at Ivy Chimneys Road, Epping), SR-0069/33 (Land South of Epping), SR-0113A (Land South of Brook Road), SR-0113B (Land to the South of Brook Road, Epping), SR-0333Bi (south-west area Epping), SR-0445 (Greenacres, Ivy Chimneys Road, Epping), SR-1002 (Land to the rear of Bridge Hill, Epping)**

4. The allocation justification, as set out in Appendix B1.6.6 [and ...] misrepresents the evidence base and therefore cannot be relied on. See table below:

<i><b>Justification</b></i>	<i><b>Comment</b></i>
“This site...	
...would support the aspirations of the emerging Epping Neighbourhood Plan, which identifies a greater level of growth in this location	<p>The emerging Epping Neighbourhood Plan reflects the emerging local plan and neighbourhood policies were devised in full knowledge of the local plan spatial strategy. It is therefore a circular argument to claim site allocation to the south of Epping are justified by the existence of policies in the emerging local plan.</p> <p>It should also be noted that neighbourhood plan policies have not yet been subject to public consultation or formally submitted to the district council or subject to independent examination.</p>
...would <b>potentially</b> [our emphasis] enable co-ordinated provision of infrastructure, including addressing existing transport constraints along Ivy Chimneys Road, Bridge Hill and Brook Road through the provision of a new road over the London Underground railway line	<p>It is unsound to base fundamental site selection decisions on pure aspiration which is not supported by the rest of the evidence base and is inconsistent with the actual local plan policies. While congestion relief along this route is badly required, this solution has not been demonstrated to be viable or deliverable given the topographical constraints and challenges inherent in crossing a live railway. It is worthy of note that previous technical work done by Essex</p>

	<p>County Council on an Epping bypass has focussed to the north of Epping from land near the Bell Motel to land near Wintry Park House (thus bypassing Palmers Hill junction).</p> <p>Policy P1 K of the submission local plan does not require a new road over the London Underground railway line which would address existing transport constraints along Ivy Chimneys Road, Bridge Hill and Brook Road. It simply requires “(v) new road access and internal road layout to support a bus corridor” and “(vi) a new vehicular, pedestrian and cycling bridge over the railway line.”</p> <p>There is no requirement in the policy for this bridge to be open to all traffic, let alone for it to act as a southern Epping bypass taking traffic additional to that generated by the development.</p> <p>This justification is also not fully supported by the Infrastructure Delivery Plan (ref EPP18) which describes a new access road behind Ivy Chimneys Road, Bridge Hill and Brook Road as desirable but not essential, or by the evidence from Essex County Council which states there is little scope for major road improvements, that the submission plan “relies heavily on a step change in terms of sustainable travel” and that growth proposals for Epping and Loughton “will, as evidence indicates, add to further pressures on the transport network and mitigation measures for these have not yet been resolved”</p>
<p>Furthermore, the site was considered to be 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. At the settlement level, 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.</p>	<p>This appears to be inaccurate. Sites SR-0069/33 (Land South of Epping), SR-0069 (Land at Ivy Chimneys Road, Epping), SR-0113A (Land south of Brook Road, Epping, SR-0333Bi (Epping, south-west area), SR-0445 (Greenacres, Ivy Chimneys Road and SR-1002 (Land to the rear of Bridge Hill) are all described in Appendix 1.6.4 as “High Performing Green Belt” and some, particularly those on higher land, have significant landscape value. Other sites not proposed for allocation (including outside Epping) have less impact on the Green Belt according to the Green Belt Review.</p>

5. The site selection process does not appear to have taken into consideration the concerns raised by the Conservators of Epping Forest about the scale of growth proposed in Epping, which is located in close proximity to the Epping Forest SAC, whereas the Conservators' concerns were a key consideration for other sites (e.g SR-0026B).