

**From:** Catherine Cracknell  
**To:** [LDFconsult](#)  
**Cc:** [Sam Cracknell](#); [Catherine Cracknell](#)  
**Subject:** Supplemental Representation to EFDC Local Plan  
**Date:** 23 April 2018 17:38:31

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## SUPPLEMENTAL REPRESENTATION

I am making this representation as: a resident

Title: Mrs  
First Name: Catherine  
Last Name: Cracknell  
Address Line 1: [REDACTED]  
Address Line 2: [REDACTED]  
Address Line 3: [REDACTED]  
Address Line 4: [REDACTED]  
Post Code: [REDACTED]  
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23<sup>rd</sup> April 2018

Dear Sir/Madam,

It has been brought to my attention by a neighbour that EFDC has opened a further consultation period on the Local Plan, owing to several additional documents being published. Unfortunately I have not had time to read all the additional information as I understand the extended consultation period ends today. However, from the brief time I have had available, I have seen enough to strengthen my opinion that the EFDC Local Plan as a whole is fundamentally unsound and should therefore be rejected. A summary of my reasoning is as follows:

### **The consultation is undemocratic and flawed as highly material information was missing**

- The additional documents made available by EFDC subsequent to the earlier consultation period include some highly material information which would likely have influenced many responses to the initial consultation. A notable example is Appendix B1.6.6 (*Results of Identifying Sites for Allocation*), which states the reasoning why certain sites were rejected from the Local Plan, whereas others remained.
- The initial consultation was therefore flawed as the public was not provided all relevant information on which to base their responses.
- EFDC has not sufficiently publicised the current 'further consultation period', which runs until 23<sup>rd</sup> April 2018. As mentioned above, I am only aware of this further consultation as a neighbour read something on Epping Society's Facebook Page. Had I not spoken to my neighbour this morning, I would not have been aware of the additional documents released by EFDC after the initial consultation period and therefore not been able to make any further representation. As I have received no information directly from EFDC, I can only assume there are many local residents who will not have had the opportunity to make a representation based on all relevant information.

**Additional documents published by EFDC suggest it has not applied an evidence based**

**approach in its site selection process**

- A common theme for sites being rejected in the above referred Appendix B1.6.6 is *“responses received through the Regulation 18 Draft Local Plan consultation indicated that the site is less preferred by the community.”*
- Whilst I am pleased to see that EFDC has appeared to take local residents views into consideration for certain sites, public opinion in isolation should not be sufficient grounds to reject or keep sites in the Local Plan. EFDC itself stated it would apply an evidence based approach for selecting sites however, based on the reasoning applied for rejecting the sites listed below (which I have selected quickly as an example) this does not appear to have been the case:
  - SR-0132Ci (Epping Sports Club, Lower Bury Lane)
  - SR-0358 (Sandford Ave/Westall Road Amenity Open Space)
  - SR-0026B (Land East of Central Line/North of Abridge Road (Including The Old Foresters Site), Theydon Bois)
  - SR-0026C (Part of the Thrifts Hall Farm, Abridge Road, Theydon Bois)
- Every local resident I have spoken to opposes the *“South Epping Masterplan”* (EPP.R1 and EPP.R2). However, owing to the flaws in EFDC’s consultation, not all residents will have made an official representation. Had they been able to do so, I wonder if EFDC would have rejected sites EPP.R1 and EPP.R2 from the local plan. I’m sure the same question could be posed for many other sites in the Local Plan. If so, then perhaps a door to door survey would have been the most appropriate means of conducting the consultation.

Owing to the approaching deadline, I have not had time to proof read this representation, so I apologise for any spelling or grammatical errors.

My initial representation, which still applies, follows below.

Kind regards

Mrs Catherine Cracknell

**INITIAL REPRESENTATION (STILL APPLIES)**

I am making this representation as: a resident

Title:	Mrs
First Name:	Catherine
Last Name:	Cracknell
Address Line 1:	[REDACTED]
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28<sup>th</sup> January 2018

Dear Sir/Madam,

The National Planning Policy Framework (NPPF) states that 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 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*".

Applying the above framework, it is my opinion that there are numerous instances where the Local Plan is not justified. The "South Epping Masterplan" (EPP.R1 and EPP.R2) is a clear example of this as it is particularly flawed. My reasoning demonstrating where the South Epping Masterplan fails the required tests of soundness are outlined below. **For these reasons, 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.**

### **1. Proposed developments do not comply with the Green Belt Policy**

- The Green Belt Policy states that building on Green Belt can only be done in "exceptional circumstances". This requirement must be applied to each and every site individually. EFDC has not justifiably demonstrated any exceptional circumstances which should be applied to the sites in the South Epping Masterplan, particularly when viable alternative sites exist. These include the plentiful existing brownfield locations in the district which could accommodate a greater density of development than what is currently proposed. This would also align better with the government's recently reaffirmed stance of protecting Green Belt.
- Further, the removal of Green Belt to the south of Epping has been assessed as "high risk". Other potential sites exist that are either low or medium Risk to Green Belt. Examples of potential sites local to Epping which were dismissed from the Local Plan include the East Epping Masterplan (medium risk) and North Weald Golf Club (low risk). The latter is not agricultural land and therefore is sequentially preferable for development.

### **2. The constraints of these sites mean they are economically unviable compared to alternatives**

- For approximately 1.25km, the sites in the South Epping Masterplan are directly adjacent to the M25, which is one of Europe's busiest motorways. The developments will therefore need significant defence from both noise and air pollution. However, no specific details or costing for how this will be achieved are included in the Local Plan.
- The sites contain high voltage cables/pylons and there are oil pipelines below the ground. There is no specific detail or costing for how this will be addressed and made safe to allow a development of the scale proposed.
- The two sites in the South Epping Masterplan are divided by the TFL maintained Central

Line. A relief road is required to be built over or under the Central Line at a cost estimated at £8-10million. Any construction is likely to create significant disruption to users of the Central Line and local residents.

- There are no guarantees about infrastructure in the South Epping Masterplan and no plans exist in the ARUP Infrastructure Delivery document. Alternative sites, such as 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.)
- The existing roads surrounding the Epping South Masterplan sites are routinely congested during busy hours. To avoid bottlenecks, the development is likely to need new relief roads to be built with two additional junctions along Stewards Green Road and at the top of Ivy Chimneys Road. However, no specific details or costing for how this will be achieved are included in the Local Plan.
- The soil in the area is predominantly clay with surface water routinely present on the fields during the colder months. Further, certain areas of the sites are regularly prone to flooding during heavy rainfall. It will be challenging and costly to implement measures to avoid exacerbating this problem if there is to be a development of the scale proposed in the Epping South Masterplan. However, this issue seems to have been overlooked or ignored in the Local Plan, despite being raised by many residents in the consultation.
- Each of the above matters must be addressed just to enable a development to be built. At alternative sites, such as East Epping Masterplan or North Weald Golf Club, the significant cost could be much better allocated to introducing the essential infrastructure that is required for the proposed increase in local population. The fact that EFDC has seemingly ignored this compelling evidence and not sought more reasonable alternatives again demonstrates that the Local Plan is unjustified.

### **3. The location of these sites presents an environmental health and safety risk that alternative sites do not**

- As outlined above, these sites are in very close proximity to one of the busiest roads in Europe. Any development here would contravene guidance presented to governments and policy makers by World Health Organisation (WHO) <sup>[1]</sup>, which is based upon multiple scientific studies which have proven significant health risks to people living close to busy roads.
- 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 proposed sites are a considerable walking distance from Epping's key amenities, such as the Underground Station, High Street shops, local GP surgeries and the local Senior School (Epping St John's). Each of those destinations is also uphill from the proposed sites. It is unrealistic to expect future residents to consistently walk or cycle these journeys, meaning an increase in traffic should be expected. This contradicts one of the

sustainability commitments promised in the Local Plan by EFDC to promote cycling and walking.

- The above issues do not apply to alternative sites, such as East Epping Masterplan or North Weald Golf Club. The East Epping Masterplan site is positioned much closer to Epping's key amenities, meaning walking and cycling is a more viable option. Notably, at its closest point the site is 320m to the main entrance of Epping Underground Station, via a relatively flat walk. This compares to 785m, mostly uphill from South Epping Masterplan's nearest point. Incidentally, the furthest point from the South Epping Masterplan to the main entrance of Epping Underground Station is 1.6km (again, mostly uphill).
- There are two primary schools which neighbour the Epping South Masterplan sites (Ivy Chimneys and Coopersale Hall). An increase in traffic to the already busy Brook Road and Ivy Chimneys Road would represent an elevated safety risk for pupils and their parents. Further, the aforementioned roads are often single track in places due to on street parking and are regularly congested as a result. It is inconceivable how construction vehicles for such a large development could safely use these roads. However, since there is no detailed infrastructure plan it must be assumed that this is the expectation. Alternatively, the East Epping Masterplan includes plans for access roads away from any schools and the North Weald Golf Club site has good access to the A414 and M11.
- Again, the fact that EFDC has seemingly ignored the above compelling evidence and not sought more reasonable alternatives demonstrates that the Local Plan is unjustified.

#### **4. Inadequate consultation of the Local Plan was not legally compliant**

- Consultation with the public has not been meaningful as responses from the 2012 and 2016 consultations have not been followed through. There is no transparency as to how amendments to the draft Local Plan were arrived upon and evidence put forward in the consultation appears to have been ignored. Conversely, EFDC is prepared to accept so called evidence which is known to be flawed. An example of this is TFL's claim that the Central Line has an abundance of spare capacity, when any user of the service at either rush hour will assert that is clearly not true.
- At the time of the 2016 consultation, the draft Local Plan had almost no details about plans for supporting infrastructure. There has therefore been no consultation on infrastructure requirements and the public was not afforded an opportunity to assess the draft Local Plan alongside this key information.

#### **Conclusion / summary**

There is compelling evidence that the Epping South Masterplan sites have been included in the Local Plan ahead of reasonable and more viable alternatives. The Local Plan is therefore not justified and unsound. EFDC should be following an evidence-based approach and they have failed to demonstrate this. Therefore, the EFDC Local Plan should be rejected, or major

amendments made.

Development should be removed entirely from South Epping and re-allocated to alternative sites. Locally, there are two obvious, large sites that exist and are available which I have made reference to. In the balance of evidence outlined above, they are more appropriate, sustainable, and economically viable. They were submitted to EFDC, but do not appear in the Final Plan. Developers already have detailed plans for these two sites. Other sites may also be available in the District.

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[\[1\]](#) World Health Organisation (WHO) report, titled Health effects of transport-related air pollution (2005)