

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

PART A

I am making this representation as: a resident

Title: Mrs

First Name: Katie

Last Name: Hughes

Address Line 1:

Address Line 2:

Address Line 3:

Address Line 4:

Post Code:

Telephone No:

E-mail:

Representation

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.

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 South Epping Masterplan fails crucial tests of soundness

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 its 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.

So what reasonable alternatives exist?

There are two obvious, large sites that exist and are available which I have made reference to. 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. 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. A truly sustainable development promoting walking and cycling to the village.

Eleanor Laing MP for Epping Forest (and resident of Theydon Bois) says: *"You mention the number of dwellings suggested for Theydon Bois. Just for the record, my personal opinion is that Theydon Bois could take rather more than the number of dwellings suggested in the current plan"*.

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 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 viable sites.

The selection of the South Epping Masterplan as an appropriate site to develop defies all logic.

Appropriate, alternative “out of the box” developments have been proposed to provide housing and associated infrastructure, and they are fully costed.

See the below table for a simple comparative analysis of the South Epping Masterplan vs. the two alternative sites suggested, with a brief re-cap of the main points.

	South Epping Masterplan	East Epping Masterplan	North Weald Golf Course Development
Site Constraints	Many. Mitigation of air and noise pollution from the M25. Presence of High Voltage Pylons, an oil pipeline, TPO's, ancient woodland, BAP Habitat. Very poor topography for building.	None.	None.
Sustainability	Unsustainable. Long distance from Tube Station and Epping Shops which are all uphill. Walking or cycling would be an impossibility, resulting in an increase of car usage and local traffic.	Sustainable. Within walking distance of Tube station and Epping Shops. Walking and cycling can be promoted.	Sustainable. Linked to major roads (A414/M11).
Infrastructure Requirements	Many. A relief road over or under the Central Line would cost £8-£10million. Additional costly junctions at either end of the new road.	None.	None.
Risk of Removing from Green Belt	High.	Moderate/Low.	Low. This site is not agricultural and therefore is sequentially preferable for development.
Land Assembly	Delivery difficult. 6 separate landowners. Not promoted as a cohesive development.	Delivery straight forward. 2 landowners working together with an established Developer.	Delivery straight forward. 1 landowner working with an established Developer.
Access and Highways	Existing roads are already at capacity. Brook Road and Ivy Chimneys Road are single track in places. Single-track access to proposed site through Flux's Lane.	Existing wide roads (Stonards Hill and Stewards Green Road) can be used to access the site.	Linked to major roads (A414/M11). Traffic from this development would not pass through the bottleneck of Epping.

Development Benefits	No guarantee that key infrastructure will be delivered. There are no plans.	A school, GP Surgery, leisure and retail facilities all costed as part of the development.	A school, GP Surgery, leisure and retail facilities all costed as part of the development.
-----------------------------	---	--	--