

TOWN AND COUNTRY PLANNING ACT 1990

**REPRESENTATIONS IN RESPONSE TO
THE EPPING FOREST DISTRICT LOCAL PLAN
SUBMISSION VERSION 2017 (LPSV) MAIN
MODIFICATIONS CONSULTATION (ED130)**

AUGUST 2021

ON BEHALF OF BARWOOD LAND

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1.0 INTRODUCTION

- 1.1 This statement has been prepared on behalf of Barwood Land as incumbent land promoter on behalf of the landowners at allocation EPP.R1, in response to the Epping Local Plan Post-Examination Hearings Main Modifications for public consultation which were published for public consultation by the Council in August 2021.
- 1.2 The statement is submitted on behalf of parties who all have land interests at the proposed allocation of EPP.R1, which forms part of the South Epping Masterplan Area (SEMPA).
- 1.3 Submissions have been made at previous consultations on the draft Local Plan and these representations should be viewed in the context of our previous comments.

2.0 REPRESENTATIONS IN RESPONSE TO MAIN MODIFICATIONS

In the following tables we set out our response to each of the modifications proposed:

M46 Supporting text to Policy DM 2

Proposed Modification	Response: comment / proposed re-wording
<p>Paragraph 4.20 split to create new paragraph as follows:</p> <p>“x.xx Furthermore, In terms of air quality, detailed modelling and analysis undertaken to inform the HRA 2021 has demonstrated that changes in atmospheric pollution would not lead to an adverse a likely significant effect on the integrity of these Lee Valley SPA/ Ramsar sites either alone or in combination with other projects and plans (including those plans being developed by neighbouring local authorities). However, the Epping Forest SAC is currently assessed as being of ‘unfavourable conservation status’. in part as a result of the effects of Concerns exist in relation to both increasing recreational use and air-borne pollutants, including from traffic. This latter point concern arises from relates to an underlying traffic/air quality issue as a result of existing substantial baseline traffic flows, and the resulting queues, combined with the age and mix of vehicle types that currently use roads in close proximity to the Forest. Standard impact assessment The modelling undertaken for the HRA-2021 methodologies shows that development proposed through neighbouring authorities the Local Plans being developed within the West Essex/East Hertfordshire Housing Market Area would not result in an adverse effect on the roads modelled. The primary contributor which would add to this existing problem is from those developments in the District allocated through this Plan as well as background growth in the District which would result in any increase in traffic using roads in close proximity to the Forest. due to an Whilst it is expected that there will be some improvement in air quality through the introduction of new technologies, and contributions to any retardation of that improvement is extremely small the HRA 2021 modelling concludes that this on its own will not be sufficient to reduce the level of air pollution to acceptable levels by the end of the Plan period. However, addressing the underlying issue is a matter of good stewardship.”</p> <p>Amend Paragraph 4.23 as follows:</p> <p>“4.23 In addition to the above tThe Council,</p>	

through this Local Plan, recognises the need to provide confidence that new development does not result in any likely significant adverse effects on the integrity of the Forest and the Lee Valley SPA/Ramsar sites. Policy T 1 (Sustainable Transport Choices) and DM 22 (Air Quality) As well as Policy DM2 a range of other policies within this Plan provide the mechanisms policy framework by through which the Council will seek secure the delivery of specific measures to address the underlying issue of negative effects on the Forest as a result of air pollution arising from additional traffic/ air quality issues and recreational pressures arising from new homes. In addition, provision is made in relation to the Forest, and provide for monitoring the effectiveness of those measures.

These measures form part of a mitigation framework for managing the effects of new development on the Epping Forest SAC.

In addition, As well as Policy DM2 these policies include:

- Policy SP2 (Place Shaping);
- Policy SP3 (Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town);
- Policy SP4 (Garden Town Communities);
- Policy SP6 (The Natural Environment, Landscape Character and Green and Blue Infrastructure);
- Policy T1 (Sustainable Transport Choices);
- Policy DM1 (Habitat Protection and Improving Biodiversity);
- Policy DM5 (Green and Blue Infrastructure);
- Policy DM9 (High Quality Design);
- Policy DM22 (Air Quality);
- the Places Policies in Chapter 5 and the site specific requirements in Part Two of this Plan; and
- Policy D8 (Local Plan Review).

provides the mechanisms for managing future recreational pressures on the Forest in particular. The Council's approach is to facilitate the development of a green infrastructure network. Through improved links to other green spaces, and to the quality of those green spaces and links, the human pressure on these assets is intended to be more widely spread, with the aim of being less harmful to biodiversity."

New Paragraphs following Paragraph 4.23:

"x.xx In relation to air pollution the Council has adopted an Air Pollution Mitigation Strategy

(APMS) which sets out the actual measures that the Council will implement during the lifetime of the Plan. These measures range from those which will help to limit the increase in the level of traffic using roads through the Epping Forest SAC and significantly increase the uptake of electric vehicles, through to the implementation of a 'Clean Air Zone' should the future monitoring demonstrate that it is required [INSERT FOOTNOTE 1 AS BELOW]. The APMS also includes targets against which progress will be assessed together with a Monitoring Framework, which includes for future on-site monitoring. This Monitoring Framework is necessary to ensure that progress towards the achievement of these targets is assessed and inform any necessary changes that may need to be made to the targets and measures and identified in the APMS or the Local Plan in terms of the quantum and location of development being proposed."

Footnote 1 to read:

"1 The HRA 2021 concludes that a Clean Air Zone will be required, but it is possible that improvements in air quality may proceed more quickly than has been assumed in the modelling underlying the HRA and in that eventuality the need for a CAZ can be reviewed in response to air quality monitoring data."

x.xx The Council recognises that additional residential development within parts of the District is likely to give rise to further visitor pressure on the Forest that needs to be either avoided or mitigated. These parts of the District are defined by a 'Zone of Influence' which has been established using evidence from visitor surveys in 2017 and 2019. The current 'Zone of Influence' is 6.2km but this may change over the course of the period of this Plan as a result of future visitor surveys that are scheduled to be undertaken as part of the Monitoring Framework for the Forest. In order to protect the vulnerable habitats within the Forest the Council will secure the provision or enhancement of alternative spaces and corridors that can relieve the recreational pressure on the Forest. This can be achieved by increasing public access to land that is not in the Forest, and altering the character of existing open spaces and the links between open spaces. These approaches are intended to improve access for walkers, dog walkers, cyclists and horse riders to recreational spaces other than the Forest as well as provide for additional space for wildlife and plant species. In order to achieve this objective the Council has adopted a Green Infrastructure Strategy which provides the District wide framework for providing new areas

The supporting text to policy DM2 refers to the Air Pollution Mitigation Strategy (APMS). The current published APMS is labelled 'Interim' and was produced to help clear a backlog of planning applications. There is no date for the final strategy and the IAPMS does not appear to have been formally consulted on as part of the EIP process. It is noted here that the Monitoring Framework in the IAPMS could impact on the quantum and location of development proposed. There is no clarity on when the next APMS will be published. Plans should only contain policies that provide a clear indication of how a decision maker should react, the proposed wording is imprecise. The proposed wording is not positively prepared and is therefore not sound.

The wording of the text should therefore be amended as follows:

"This Monitoring Framework is necessary to ensure that progress towards the achievement of these targets is assessed and inform any necessary changes that may need to be made to the targets and measures and identified in the APMS ~~or the Local Plan in terms of the quantum and location of development being proposed."~~

<p><u>of Suitable Alternative Natural Greenspace (SANG) related to a number of the Masterplan areas together with identified opportunities to provide an alternative recreational offer to the Forest, including through enhancements to existing open spaces. These measures will be implemented by developers of relevant sites or through securing financial contributions for the implementation of measures by the Council and its partners.</u></p> <p><u>x.xx The Council does, however, recognise that there are no mechanisms for preventing new residents from using the Forest and that there is therefore a need to address this by working with the Conservators of Epping Forest to implement Site Access Management and Monitoring (SAMM) measures within the Forest itself. The Council has adopted an 'Interim Approach to Managing Recreational Pressure on the Epping Forest Special Area of Conservation' which identifies a range of measures to be implemented and monitoring activities to be undertaken over the course of the period of the Plan. The Interim Approach also identifies the level of financial contributions that will be secured from relevant residential developments within the 'Zone of Influence.' The Council will continue to work with neighbouring authorities and the Conservators of Epping Forest to update and refine these projects and programmes and the approach to securing financial contributions over the course of the Plan period.</u></p>	
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MM47 Policy DM2

Proposed Modification	Response: comment / proposed re-wording
<p>Amend Parts A, B and C and remove Parts D and E as follows:</p> <p><u>"A. The Council will expect all relevant development proposals to assist in the conservation and enhancement of the biodiversity, character, appearance and landscape setting of the Epping Forest Special Area of Conservation (SAC) and the Lee Valley Special Protection Area (SPA). The Council will expect all relevant development proposals to ensure that there is no adverse effect on the site integrity of the Epping Forest Special Area of Conservation (SAC) and the Lee Valley Special Protection Area (SPA).</u></p> <p><u>B. New residential development that will have an adverse effect on integrity, likely to have a significant effect, either alone or in combination with other development in these areas plans or</u></p>	

projects, will not be permitted unless sufficient will be required to demonstrate that adequate measures are secured and delivered to ensure there put in place to avoid or mitigate any potential adverse effects will be no harm to the integrity of the protected sites. For the Epping Forest SAC, the need for a strategic approach has been identified and such measures will therefore be expected to include those identified in the Mitigation Strategies adopted by the Council relating to air pollution and recreational pressure, which will be reviewed and updated where monitoring indicates this is necessary as required over the Plan period. For the avoidance of doubt, the relevant strategies for the Epping Forest, which have been adopted by the Council as a material consideration in the determination of planning and other relevant development related applications, are as follows:

- i) An Air Pollution Mitigation Strategy;
- ii) An Approach to managing Recreational Pressure on the Epping Forest Special Area of Conservation (SAMM Strategy); and
- iii) A Green Infrastructure Strategy.

B1 – Epping Forest Air Pollution Mitigation Strategy – To mitigate for potential or identified adverse effects on air quality arising from additional development in the District, all development giving rise to a net increase in average annual daily traffic, will be required to be mitigated in accordance with appropriate measures including those identified in the most up to date Air Pollution Mitigation Strategy adopted by the Council as a material consideration in the determination of planning and other relevant development related applications and proposals. **Measures have been specifically identified in the Strategy to ensure no adverse effect on the integrity of the Epping Forest SAC. Development which is required to deliver measures on site or contribute to the delivery of off-site measures and the undertaking of monitoring will not be consented until such those measures, and any necessary financial contributions required for their delivery, are secured.**

B2 – Epping Forest SAMM Strategy - To mitigate for potential or identified adverse recreational effects of additional residential development within the Epping Forest SAC Zone of Influence development proposals will be required to make a financial contribution towards the implementation of the be mitigated through SAMM strategy, measures. in accordance with the most up-to date strategy adopted by the Council.

Comment: The proposed text here allows mitigation in accordance with the APMS as is states “*To mitigate for potential or identified adverse effects on air quality arising from additional development in the District, all development giving rise to a net increase in average annual daily traffic, will be required to be mitigated in accordance with appropriate measures including those identified in the most up to date Air Pollution Mitigation Strategy*”, therefore there is no need for a delay in delivery on development on allocated sites of EPP. R1 and EPP.R2 the SEMPA sites.

B3 – Epping Forest District Green Infrastructure Strategy - To mitigate for potential or identified adverse recreation effects of additional residential development in the Epping Forest SAC Zone of Influence, including from strategic developments, the Council will ensure both provision of and access to sufficient Suitable Alternative Natural Greenspace (SANGs) and/or the implementation of enhancements to existing Green and Blue Infrastructure assets. Such provision and enhancements should be in accordance with the site-specific policies contained within this Plan and the most up-to-date adopted Green Infrastructure Strategy.

These measures include:

- (i) providing new natural greenspaces; or
- (ii) improving access to natural greenspaces; or
- (iii) improving the recreation facilities, naturalness, and habitat quality of existing greenspaces; or
- (iv) improving the connectivity between greenspaces where this would not result in an adverse effect on the integrity of any designated site.

Relevant development proposals will be required to make a financial contribution towards the delivery of off-site projects in accordance with the adopted Green Infrastructure Strategy.

C. All outline or detailed planning applications for new homes within the settlements of Loughton, Epping, Waltham Abbey, North Weald Bassett, Theydon Bois, Coopersale, Thornwood, Buckhurst Hill, Chigwell and Chigwell Row will be required to make a financial contribution to access management and monitoring of visitors to the Epping Forest SAC, in accordance with Visitor Survey Information which demonstrates this is needed. In recognition of the risks posed to the Epping Forest SAC from urbanisation effects over and above that resulting from recreational pressures (including from fly tipping, the introduction of non-native plant species and incidental arson) planning applications for development will not be permitted within 400m perpendicular to the boundary of the Epping Forest SAC, unless it can be demonstrated through project level HRA that the development would not generate any such impacts [INSERT FOOTNOTE 2 AS BELOW].

D. To mitigate against potential or identified adverse effects of additional development in the District, in particular from strategic developments, on the Epping Forest SAC, and Lee Valley SPA the Council will ensure the provision of a meaningful proportion of Natural Green Space or access to Natural Green Space. This

<p>could involve:</p> <ul style="list-style-type: none"> (i) providing new green spaces; or (ii) improving access to green space; or (iii) improving the naturalness of existing green spaces; or (iv) improving connectivity between green spaces <p>where this would not contribute to a material increase in recreational pressure on designated sites.</p> <p>E. Planning applications on sites within 400m of the Epping Forest SAC will be required to submit a site level Habitats Regulations Assessment setting out how any urbanisation effects (including from fly tipping, the introduction of non-native plant species and incidental arson) will be mitigated against.”</p> <p>Footnote 2 to read:</p> <p>“2 Note that this is not a ‘no development’ buffer but rather a trigger for application level further consideration of each proposal within that zone.”</p>	
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MM74 Supporting Text to Policy DM 22 Page 95-98

Proposed Modification	Response: comment / proposed re-wording
<p>Combine Paragraphs 4.158 and 4.159 as follows and amend Paragraph 4.159 (LPSV para 4.160):</p> <p>“4.158 The local air quality management (LAQM) regime requires every district <u>local authority</u> to regularly review and assess air quality in their area. These reviews identify whether national objectives have been, or will be, achieved at relevant locations, by an applicable date. If national objectives <u>for human health</u> are not met, or at risk of not being met, the local authority concerned must declare an an <u>Air Quality Management Area (AQMA)</u> and prepare an an <u>Air Quality Action Plan (AQAP)</u>. This identifies measures that will be introduced in pursuit of the objectives and can have implications for planning. <u>The Council was required to declare an AQMA in the area of Bell Common, Epping in 2010. The AQMA is still in place due to very localised NOx levels and the Council is continuing to monitor the situation and work towards reducing these levels such that there is no longer a need to declare an AQMA.</u></p> <p>“4.159 <u>The effect of Air quality pollution can also affect biodiversity on ecologically sensitive habitats of international importance and may therefore impact on our international obligations is required to be considered</u> under the Habitats Regulations Directive. As set out in the supporting text to Policy DM2 the health of the Epping Forest SAC is sensitive to, amongst other things, air-borne pollutants, including those</p>	

generated as a result of traffic and the Council cannot consent plan or projects that would either alone or in combination with other plans and projects would have an adverse effect on the integrity of the Epping Forest SAC. In addition the Council was required to declare an Air Quality Management Area (AQMA) in the area of Bell Common, Epping in 2010. This is still being monitored as nitrogen dioxide levels are still elevated and the Council is required to reduce them by 2020.”

Amend Paragraph 4.161 as follows:

“4.161 Local Plans can affect air quality in a number of ways, including through what development is proposed and where, and the encouragement given to sustainable transport. Consideration of air quality issues at the plan-making stage can ensure a strategic approach to air quality and help secure improvements in overall air quality where possible. Therefore in plan making, it is important to take into account AQMAs air quality management areas and other areas where there could be specific requirements or limitations on new development because of air quality and its effects on both human and ecological health.”

Amend Paragraphs 4.162 and 4.163 as follows:

“4.162 The approach to the location of development in the Local Plan has included the consideration of the sustainability of sites in respect to accessibility, or potential accessibility to facilities, services and jobs, by means other than the car. The reduction in levels of car use can have a significant positive effect on the air quality in an area, as can the provision of infrastructure which supports the use of new technologies, such as electric vehicles. This approach is taken forward through a number of policies in the Local Plan including:

- Policy SP1 (Spatial Development Strategy);
 - Policy SP2 (Place Shaping);
 - Policy SP3 (Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town);
 - Policy SP4 (Garden Town Communities); and
 - Policy T1 (Sustainable Transport Choices).
- Policy SP2 (Spatial Distribution) and Policy T 1 (Sustainable Transport Choices). As set out within the Memorandum of Understanding the Council is working with the City of London Corporation, Natural England and other Housing Market Area authorities to address both the requirement to

~~avoid, or effectively mitigate, adverse impacts on the integrity of the SAC from Local Plan led development and the requirement to prevent deterioration of the SAC features.~~

~~4.163 In addition to the above policies It is important that the effects from development, both individually and cumulatively, are assessed where they have a potential effect on the health of people and biodiversity within the District, and that appropriate mitigation and monitoring measures are secured. As traffic is a major contributing factor to effects of humans and habitats, all new development which requires the submission of a Transport Assessment or Transport Statement (as set out in the Council's Local Validation Checklist) will be required to submit an assessment of air quality impacts which may arise as a result of the development.~~

~~This is in addition to other developments which will require the submission of such assessment where the proposal has the potential to impact on air quality."~~

New Paragraphs following 4.163 as follows:

"x.xx The Council has adopted an Air Pollution Mitigation Strategy (APMS) which provides a District-wide approach to managing the effects of new development on the Epping Forest SAC. As required by Policy DM2 all planning applications for development in the District which give rise to a net increase in traffic flows will be required to adopt or make financial contributions to the relevant measures set out in the adopted APMS. In addition to addressing the air pollution impacts on the SAC, the APMS will have wider air quality benefits across the District, including the Bell Common AQMA."

"x.xx In addition to traffic related effects on the Epping Forest SAC considerations that may be relevant to determining a planning application include whether the development would:

- Lead to changes (including any potential reductions) in vehicle-related emissions in the immediate vicinity of the proposed development.
- Introduce new point sources of air pollution. This could include furnaces which require prior notification to local authorities; biomass boilers or biomass-fuelled Combined Heat and Power plant; centralised boilers or plant burning other fuels within or close to an AQMA or introduce relevant combustion within a Smoke Control Area; or extraction systems (including chimneys) which require approval or permits under

Comment: This wording appears to allow developments that come before the allocated sites of EPP. R1 and EPP.R2 (SEMPA) sites not to be restricted on their delivery as they do not need to wait for the proposed 2024/25 monitoring, such sites just have to adopt or make financial contributions to the relevant measures as set out in the APMS.

<p><u>pollution control legislation;</u></p> <ul style="list-style-type: none"> • <u>Expose people to harmful concentrations of air pollutants, including dust. This could be by building new homes, schools, workplaces or other development in places with poor air quality;</u> • <u>Give rise to potentially unacceptable impacts (such as dust) during construction for nearby sensitive locations.”</u> <p><u>“x.xx The Council’s Local List of Validation Requirements sets out the type and scale of planning application that will be required to be supported by an air quality assessment. It is important that applicants engage early on in the development of their scheme with both the Council’s planning and environmental health departments to establish the need and scope of any assessment to support an application. For large and complex industrial processes, the Environment Agency should also be engaged at an early stage.”</u></p>	

MM75 Policy DM 22 Page 98 - 99

Proposed Modification	Response: comment / proposed re-wording
<p>Amend Part B and Part C as follows:</p> <p>“B. Any required mitigation measures required will be determined by the scale of development, its location, the potential to cause air pollution, and the presence of sensitive receptors in the locality. <u>Such requirements will include, where appropriate, measures identified within the most up-to-date Air Pollution Mitigation Strategy for Epping Forest adopted by the Council as a material consideration in the determination of planning and other relevant development related applications and proposals. With regard to the measures specifically identified in the Strategy to ensure no adverse effect on the integrity of the Epping Forest SAC, development which is required to deliver measures on site or contribute to the delivery of off-site measures and the undertaking of monitoring will not be consented until such measures and any necessary financial contributions required for their delivery are secured.</u></p> <p>C. <u>The Council has undertaken a detailed strategic modelling exercise assessing the effects of all planned housing and employment growth in the District on the Epping Forest SAC. Larger proposals or those on sites that are not allocated in the Local Plan, or which have not</u></p>	<p>Comment: This wording appears to allow developments that come before the allocated sites of EPP. R1 and EPP.R2 (SEMPA) not to be restricted on their delivery as they do not need to wait for the proposed 2024/25 monitoring, they just have to undertake an assessment, mitigate and make financial contributions. There is no reason for the</p>

<p><u>been accounted for in the strategic modelling undertaken by the Council, that have the potential to produce affect air pollution, will be required to undertake an air quality assessment that identifies the potential impact of the development in combination with existing baseline pollution and other plans and projects., together with, where appropriate, contributions towards air quality monitoring. Assessments shall identify mitigation measures that will address any deterioration in air quality as a result of the development, having taken into account other permitted developments, and these measures shall be incorporated into the development proposals together with financial contributions to support the implementation of off-site measures and the monitoring of their efficacy in accordance with the Council’s Air Pollution Mitigation Strategy.”</u></p> <p>Remainder of C to become two new parts after C as follows:</p> <p>“<u>. Development proposals which will result in air quality impacts on sensitive receptors other than the Epping Forest SAC This will include be required to undertake an assessment of the emissions (including from traffic generation) created and identify the mitigation measures that will address any deterioration in air quality as a result of the development. and calculation of the cost of the development to the environment.</u></p> <p>“<u>. All assessments for of air quality impacts shall be undertaken by competent persons.”</u></p>	<p>SEMPA site to be treated differently, there is no need for a delay in delivery on development on allocated sites of EPP. R1 and EPP.R2 the SEMPA sites.</p>
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MM78 Policy P 1 Pages 102 - 108

Proposed Modification	Response: comment / proposed re-wording
<p>Amend Part B title as follows: Residential and Mixed Use Sites</p> <p>Amend Policy P 1 Part B as follows:</p> <p>B. In accordance with Policy SP12 the following sites are allocated for residential or mixed use development:</p> <p>Amend Policy P 1 Part B as follows:</p> <p>(i) EPP.R1 Land South of Epping West and Approximately 450 homes EPP.R2 Land South of Epping, East – approximately 500 450 homes and <u>appropriate uses</u></p>	<p>We consider the proposed modifications unnecessarily restrictive. The capacity plan produced jointly by the promoters of the two site shows that the site is capable pf providing 735 to 829 dwellings. Therefore to provide an appropriate level of flexibility to make the plan sound by being positively prepared, the numbers of dwellings should be expressed as a minimum. All other Masterplan and</p>

~~“(ii) EPP.R3 Epping London Underground Car Park – Approximately 89 homes~~
“(iv) EPP.R5 Epping Sports Centre – Approximately 432 homes”
~~“(ix) EPP.R10 Land to rear of High Street – Approximately 6 homes”~~

Amend Policy P 1 Part B as follows:

“(iii) EPP.R4 Land at St Johns Road – Approximately 34 homes and appropriate uses”

New Part following Part C as follows:

“Sustainable Transport Choices

In accordance with Policy T1, all development proposals must demonstrate opportunities to access jobs, services, education and leisure opportunities by means other than the car have been addressed, both within Epping and to the Harlow and Gilston Garden Town. This includes the need to make provision for, improve, enhance and promote use of existing cycling and walking networks and access to passenger transport services.”

Amend Part D as follows:

“Infrastructure Requirements
D. Infrastructure requirements must be delivered at a rate and scale to meet the needs that arise from the proposed development, in accordance with the Infrastructure Delivery Plan Schedule unless subsequent iterations of the Infrastructure Delivery Plan Schedule or discussions with providers determine that these requirements have changed.”

Remainder of D to become new Part after D and specified elements amended as follows:

“. ~~Specifically,~~ Development proposals in Epping will be expected to deliver and/or contribute proportionately towards the following infrastructure items as required, including:
(ii) ~~new primary school~~ education provision including early years, primary school and secondary school places;
(iii) ~~appropriate~~ provision of health facilities;
() provision of walking and cycling facilities and linkages both within the site and to key destinations;
() enhancements to public transport provision or other initiatives which reduce the need to travel by car;
(iv) highways and junction upgrades;
(v) ~~upgrades to Lindsey Street electricity sub-~~

Concept Framework Areas in the plan are expressed as a minimum and they should all be expressed as a minimum for consistency and to align with the NPPF.

It is therefore requested that the text is amended as follows:

- (i) EPP.R1 Land South of Epping West and ~~Approximately 450 homes~~ EPP.R2 Land South of Epping, East – **a minimum of** ~~approximately 500~~ 450 homes and appropriate uses

station upgrade and improvement of utility infrastructure including water, waste water, solid waste, gas, electricity and telecommunications; and
~~(vi) necessary upgrades to existing waste water infrastructure; and~~
~~(vii) appropriate provision of green infrastructure and open space throughout the settlement improvements and provision of green and blue infrastructure assets including open space."~~

New Part under 'Infrastructure Requirements' between Part D and Part E:

" A new leisure centre will be provided in Epping to replace the facility currently located at site EPP.R5."

Deletion of Part E as follows:

~~"E. Development proposals must contribute proportionately towards the delivery of those infrastructure items set out above and in the Infrastructure Delivery Plan (IDP)., unless subsequent iterations of the Infrastructure Delivery Plan or discussions with providers determine that these requirements have changed~~

Amend Part G as follows:

~~"G. The development of the allocated sites within Epping have the potential to produce air pollution that could impact upon air quality in the District, including the Epping Forest. All development proposals will need to demonstrate that they are in accordance with Policy DM2 and Policy DM22 and the Council's adopted Air Pollution Mitigation Strategy. This includes, where necessary, the provision of financial contributions for the purposes of implementing air pollution mitigation initiatives and undertaking air quality monitoring and any necessary future air quality assessments., all proposals on sites which require a Transport Assessment/Transport Statement will be required to undertake an air quality assessment that identifies the potential impact of the development, together with contributions towards air quality monitoring."~~

Amend Part H as follows:

~~"H. Due to their proximity to Epping Forest, Developments of the allocated sites within Epping will be required to make a contribution to the access management and monitoring of visitors to the Forest which would result in a net increase in dwellings have the potential to result in recreational pressure on the Epping Forest SAC. All such developments will need to demonstrate that they are in accordance with Policy DM2. This includes, where necessary, the~~

provision of financial contributions towards mitigation and monitoring measures.”

Replace Part I as follows:

“I. In accordance with Policy DM 15, development on residential allocations must be located wholly within Flood Zone 1. Except for essential infrastructure and water compatible developments, no built development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council's latest Strategic Flood Risk Assessment maps, including the appropriate allowance for climate change.”

Amend Part J as follows:

“J. Development proposals in relation to sites EPP.R1 and EPP.R2 must ~~comply~~ be in general conformity with a Strategic Masterplan for the South Epping Masterplan Area which has been formally endorsed by the Council prior to the determination of any planning applications.”

Amend Part K as follows:

“K. In addition to the requirements set out above, the Strategic Masterplan ~~should~~ must make provision for:

- (i) ~~a minimum of 950~~ approximately 450 homes;
- (ii) ~~a new neighbourhood centre to include~~ appropriate community and health facilities, employment and retail uses;
- (iii) a new primary school and early years childcare provision (which could be accommodated through the relocation of Ivy Chimneys Primary School);
- (iv) ~~appropriate provision of health facilities, exploring the potential for a new health hub to include an integrated GP surgery, pharmacy and any other necessary health services;~~
- (v) ~~new road access and internal road layout to support a bus corridor;~~

Provision or enhancement of walking and cycling facilities, Public Rights of Way and linkages both within the site, over the railway line, the footbridge over the M25, and to key destinations including Epping London Underground Station and the Town Centre;

- (vi) ~~a new vehicular, pedestrian and cycling bridge over the railway line;~~ Vehicular access/egress which provides safe access to the local highway network, does not impact on its safe and efficient operation, does not result in the loss of important boundary trees and/or hedgerows, or cause material harm to the living conditions of adjoining residents as a result of noise, light pollution or privacy.
- (vii) ~~car clubs/car sharing or pooling~~

We consider the proposed modifications unnecessarily restrictive and not positively prepared. The capacity plan produced jointly by the promoters of the two site shows that the site is capable pf providing 735 to 829 dwellings Therefore to provide an appropriate level of flexibility the numbers of dwellings should be expressed as a minimum.

With regards to the primary school, at present there are ongoing discussions between EFDC and ECC regarding the requirement for a new primary school provision within the SEMPA. Therefore, it may be that a school is not required and therefore the text should be amended to allow the site to deliver and/or contribute proportionately to the school. This will ensure that the plan is positively prepared.

The suggested text wording is as follows:

- i) approximately a minimum of 450 homes;
- iii) deliver and/or contribute proportionately to a new primary school and early years childcare provision (which could be accommodated through the relocation of Ivy Chimneys Primary School);

~~arrangements, visitor parking and blue badge holders;~~

~~(viii) minimising the impact upon preserving or enhancing the setting of the Grade II listed Gardners Farm and Grade II listed Farm Buildings;~~

New point after (x):

“() the sloping topography of the site by incorporating sensitive design responses to the level changes and by ensuring a positive relationship is established between the new development, the town and the wider landscape;”

Remove point (xi):

~~(xi) careful design to avoid or reduce impacts on the ancient woodland which may include providing a buffer zone of semi natural habitat between built development and the Ancient Woodland;~~

Amend point (xii) as follows:

“(xii) the continued protection of those trees benefitting from a Tree Preservation Order and other identified Veteran trees;”

Amend point (xiv) as follows:

“(xiv) the integration, retention and improvements to the existing watercourse and Public Rights of Way, including the retention of the existing pedestrian footbridge over the M25, and enhanced linkages to Epping station;”

Amend point (xv) as follows:

“(xv) adequate levels of high quality public open space, including the ~~replacement~~ retention or re-provision of Brook Road Informal Recreation Ground; and”

Remove (xvi) as follows:

~~“(xvi) contribute towards air quality monitoring within the Epping Forest.”~~

Additional point after (xvi) as follows:

“() a Suitable Alternative Natural Greenspace.”

New Parts after Part L as follows:

“ . The Strategic Masterplan must incorporate measures to promote and encourage the use of sustainable methods of transportation and provide viable alternatives to single occupancy private car use including car clubs/car sharing or pooling arrangements. Such measures are to be planned in consultation with Essex County Council (and relevant passenger transport providers). The proposed measures should be underpinned by feasibility evidence that comprehensively demonstrates the delivery of modal shift by way of sustainable travel measures.”

This proposed text is not positively prepared, the submission of a framework travel plan could secure the required modal shift.

The proposed amended wording is as follows:

“ . The Strategic Masterplan must incorporate measures to promote and encourage the use of sustainable methods of transportation and provide viable alternatives to single

“. Any application for planning permission made subsequent to the endorsed Strategic Masterplan should be accompanied by an assessment of potential air quality impacts demonstrating compliance with J. above, Policy DM2 and Policy DM22 and the Council’s adopted Air Pollution Mitigation Strategy. Such an assessment must take into account the results of monitoring in 2024/2025 which is to be undertaken in accordance with the Council’s adopted Air Pollution Mitigation Strategy. Accordingly no application for permission should be determined prior to such monitoring results being available.”

Map 5.1

Amend site boundary of EPP.R5 and remove EPP.R3 and EPP.R10 Amend symbology of EPP.R4 to reflect symbology change for ‘mixed use’

occupancy private car use including car clubs/car sharing or pooling arrangements. Such measures are to be planned in consultation with Essex County Council (and relevant passenger transport providers). The proposed measures should be underpinned by a **Framework Travel Plan feasibility evidence** that comprehensively demonstrates the delivery of modal shift by way of sustainable travel measures.”

This text restricts development on the SEMPA until post 2025 once monitoring has been undertaken in accordance with the APMS. As stated above, the supporting text to policy DM2 refers to the Air Pollution Mitigation Strategy (APMS). The current published IAPMS is labelled ‘Interim’ and was produced to help clear a backlog of planning applications. There is no date for the final strategy and the APMS does not appear to have been formally consulted on as part of the EIP process. It is noted here that the Monitoring Framework in the IAPMS could impact on the quantum and location of development proposed. Plans should only contain policies that provide a clear indication of how a decision maker should react, the proposed wording is imprecise.

The EPP.R1 and EPP.R2 sites appear to be the only sites which are caught by requirement for this further assessment. The policy wording makes the delivery of the SEMPA reliant on the Council doing the survey work in 2024/5, this cannot be correct.

The proposed policy wording in policies DM2 (proposed MM47 paragraph B1) and DM22 (proposed MM74, new paragraph 4.163) and MM75 (amendment to part c), potentially allows unallocated sites to come forward in advance on the EPP.R1 and EPP.R2 sites.

The attached note sets out we the proposed additional wording is not positively prepared.

The wording of the text should therefore be amended as follows:

“. Any application for planning permission made subsequent to the endorsed Strategic Masterplan should be accompanied by an assessment of potential air quality impacts demonstrating compliance with J. above, Policy DM2 and Policy DM22 and the Council’s adopted Air Pollution Mitigation Strategy. **Such an assessment must take into account the results of monitoring in 2024/2025 which is to be undertaken in accordance with the Council’s adopted Air Pollution Mitigation Strategy. Accordingly no application for permission should be determined prior to such monitoring results being available.”**

allocations South Epping Masterplan Area Map Move South Epping Masterplan from Appendix 6 (now Part Two of the Plan) (including site map and site information) to Policy P1 Epping.	
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APPENDIX 5 – HOUSING, EMPLOYMENT AND TRAVELLER TRAJECTORIES MM115 Housing Trajectory

Proposed Modification	Response: comment / proposed re-wording																																										
Page 181	<p>The trajectory is not set out per site so it is difficult to comment in relation to the SEMPA site. It is noted that there is a break of delivery development in the housing trajectory for Epping, we would expect continuous build time in sites across Epping.</p> <p>As set out in previous representations to the draft local plan, the trajectory of the site should be as follows (based on the SEMPA landowners capacity assessment):</p> <table border="1" style="margin-left: 40px;"> <thead> <tr> <th>2021</th><th>2022</th><th>2023</th><th>2024</th><th>2025</th><th>2026</th><th>2027</th><th>2028</th></tr> </thead> <tbody> <tr> <td>0</td><td>0</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td></tr> </tbody> </table> <table border="1" style="margin-left: 40px;"> <thead> <tr> <th>2029</th><th>2030</th><th>2031</th><th>2032</th><th>2033</th></tr> </thead> <tbody> <tr> <td>100</td><td>35</td><td>0</td><td>0</td><td>0</td></tr> </tbody> </table> <p>Or the trajectory should be as follows, based on the Council’s minimum 450 dwellings:</p> <table border="1" style="margin-left: 40px;"> <thead> <tr> <th>2021</th><th>2022</th><th>2023</th><th>2024</th><th>2025</th><th>2026</th><th>2027</th><th>2028</th></tr> </thead> <tbody> <tr> <td>0</td><td>0</td><td>100</td><td>100</td><td>100</td><td>100</td><td>50</td><td>0</td></tr> </tbody> </table> <p>This is proposed on the following assumptions:</p> <ul style="list-style-type: none"> • Build Out rate of 100 dwelling per year based on two outlets, one for EPP.R1 and one for EPP.R2; • Local Plan adopted by the end of 2021; • Outline planning application is submitted by Q1 2021; • Outline planning permission granted by Q3 2021; • Reserved Matters applications are submitted by Q4 202; • Reserved Matters are approved by Q2 2022; and • Start on site Q1 2023. 	2021	2022	2023	2024	2025	2026	2027	2028	0	0	100	100	100	100	100	100	2029	2030	2031	2032	2033	100	35	0	0	0	2021	2022	2023	2024	2025	2026	2027	2028	0	0	100	100	100	100	50	0
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