

Stakeholder Reference:

Document Reference:

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**Part A**

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**Making representation as Resident or Member of the General Public**

<b>Personal Details</b>	<b>Agent's Details (if applicable)</b>	
Title	Mr	
First Name	Richard	
Last Name	Ley	
Job Title (where relevant)		
Organisation (where relevant)		
Address		
Post Code		
Telephone Number		
E-mail Address		

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## Part B

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### REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 78

Supporting document reference:

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: No

If no, then which of the soundness test(s) does it fail? Effective, Justified

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

South Epping 950 homes to approximately 450 homes

I do not believe this to be a sound - though a significant reduction this still represents a development as large as the neighbouring village of Coopersale in a location that has seriously concerning and limiting factors that I believe some of the further modifications fail to address.

Removal of the Vehicular Bridge Across the Central Line

This modification is truly unsound. The traffic issues in and around Ivy Chimneys School, Brook Road and Bridge Hill are well known to all local residents and councillors. Brook Road/Bridge Hill already have a dangerous accident blackspot with the bridge under the Central Line being too narrow for many vehicles to pass safely, added to the angle of the road and blind bend this creates. Collisions are a regular occurrence and near misses frequent. However the modification will increase the traffic required to use this route and I have to say it will put school children and their parents at serious risk of accident - I only last week witnessed vehicles having to mount the pavement inside the railings outside the school to alleviate the complete gridlock created by the new traffic calming measures and shear wait of traffic at school drop off time. The new road layout means it is impossible for oncoming vehicles to see one another. This modification would make a dangerous and traffic blighted area even worse.

Brook Road Recreation Ground

The Brook Road Recreation Ground is a well used playing field by many of the local sports teams with several youth football teams utilising the grounds to train. The modifications do not adequately offer suitable alternatives to those that use the facility. It doesn't appear consistent with national policy of encouraging exercise and sporting activity including getting girls playing football for example by removing the free to use open green space which is suitable for sports such as football. The modifications are unsound.

Suitable Alternative Natural Greenspace

The modifications do not answer the need to offer suitable alternative natural greenspace. The proximity of the south epping planned development to Epping Forest will make the provision for dog walkers and families etc to use this instead of utilising the forest are insufficient. When you

have one of the most beautiful and significant forests in Europe on your doorstep the alternative will not be attractive. Also the proximity of the M25 motorway and any alternate space would be compromised. I believe the forest would be significantly harmed along with the animals that reside with the increased footfall such a development would bring. Protecting the forest is I believe is high on the agenda and therefore the plan is unsound.

#### Epping Forest Air Pollution Mitigation Strategy

The level of development in an area of Epping known for air pollution issues caused by the M25 and the Bell Common junction does not seem to be compatible with the policy of protecting the forest and local residents from the harmful effects of pollution in the main caused by vehicles. Placing such a large development a long way from local amenities, on generally much lower lying land without suitable public transport can realistically only mean more personal car use and therefore more air pollution making it impossible to meet targets required. I believe this alone makes the modifications unsound. A much more convincing solution that is based on real world knowledge would need to be presented.

I do not believe it is possible to make the plan sound in this particular location. I also do not believe the plan meets the concerns of the government's inspector concerns about the South Epping site which she expressed in her advice to the council. In my view the council's proposed changes do not respond fully to these concerns and therefore the local plan is neither justified or effective in its current form.

I would also like to point out that the process a local resident has to go through to even make a representation is in itself unsound as it certainly feels like you need to be a technical wizard and an expert in planning law to have an opinion.

**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

I do not believe it is possible to make the plan sound in this particular location. I also do not believe the plan meets the concerns of the government's inspector concerns about the South Epping site which she expressed in her advice to the council. In my view the council's proposed changes do not respond fully to these concerns and therefore the local plan is neither justified or effective in its current form.

Signature: Richard Ley Date:  
20/09/2021