

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	Martin	
Last Name	Russell	
Job Title (where relevant)		
Organisation (where relevant)		
Address		
Post Code		
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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: L. South Epping Masterplan Area Capacity Analysis (Sites EPP.R1 and EPP.R2), March 2020 (ED120/ EB1421)

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

Legally compliant: No

Sound: No

If no, then which of the soundness test(s) does it fail? Justified, Consistent with national policy

**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.**

See 7 below

**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.**

EFDC Local Plan Main Modifications

SOUTH EPPING Comments Reference MM78

Approximately 450 new homes are now proposed for the South Epping sites and over 700 in Epping. This is a lot of additional residents which will require access to local services and infrastructure that is already at or over capacity.

A vehicular bridge over the Central Line Railway between EPP.R1 and EPP.R2 sites was originally included in the Local Plan, this is a Critical Requirement that has now been removed. This removal will put additional Traffic pressure on existing narrow step local roads that are already congested with traffic and further reduced by on-street parking of vehicles, that make it difficult for emergency, delivery and refuse vehicles to get through.

The GP/health hub originally a site requirement of the South Epping Masterplan is also a critical requirement, but it has been removed. The current GP services and dentists in Epping are already oversubscribed and have to cater for residents of other surrounding villages as well as residents of Epping. It is virtually impossible to get appointments at the Limes Medical Centre or even telephone calls answered and this has been made worse since the pandemic when the online booking of appointments was suspended and has not yet been reactivated.

A new school is also required as the nearest existing primary school Ivy Chimneys is already at capacity.

Green spaces, so called SANGs are also required for use by existing local residents and occupiers of the new homes in South Epping and other new development sites. These areas need to be of suitable size on level ground and be safe for children to play, not just located on steep areas of land, under electricity cables or along water courses and around sustainable drainage ponds which have a potential danger of drowning and are unsuitable for development. The existing Brook Road Recreation Area located near the junction of Fluxs Lane, Brook Road and Bower Hill/ Stewards Green Road is a critical requirement and must be retained. The section L of the supporting documents (South Epping Masterplan Area Capacity Analysis (Sites EPP.R1 and EPP.R2), March 2020 (ED120/ EB1421)) Example maps layouts for South Epping sites show the existing Brook Road recreation area would have a new road put through the middle of it.

Housing should be a mixture of types and not just flats Ref MM28, they should not be out of scale, proportion or character with existing adjacent buildings. The way the South Epping Masterplan (Section L of Supporting Documents and Ref MM78) area is worded about the topography of the land makes it sound as if multi-storey buildings would be built closest to existing buildings on Brook Road and Ivy Chimneys and heights of new buildings would reduce as they rise up the hill towards Gardeners Farm and the M25 Motorway.

Local roads in and out of Epping are at or over capacity already at peak times. The B1393 High Road that turns into Epping High Street is usually full of stationary traffic at many times throughout the day and vehicles just can't proceed through the High Street from Bury Lane to the EFDC Council Offices. When Traffic is worst queues form from out in the Forest as far as the Upshire Road junction through Epping to Thornwood and beyond in both directions. The IDP documents ED117 and ED118 are very vague about the infrastructure improvements planned/required and the Traffic problems that Epping residents endure will only increase further with the new developments planned in South Epping and also at Latton Priory which is to be accessed from further along the B1393 London Road between Thornwood and the M11 Junction 7 Motorway roundabout.

The Latton Priory Development site will have a vast impact on residents of neighbouring towns of Harlow and Epping, and also those living in the Village of Thornwood. Occupiers of new homes at Latton Priory will use the B1393 through Thornwood to Epping to access Local Shops and Sports/Health services. It seems somewhat unfair that the allocation of around 1000 homes at Latton Priory is classed as being allocated to North Weald. Although it may be located geographically in the Parish of North Weald it is actually cut off from the village by the M11 Motorway and North Weald Airfield, so is virtually on the edge of the Town of Harlow and on the doorstep of Epping via the B1393 road through Thornwood. It is no wonder that there have been news reports that Harlow Town council intends to object to the Latton Priory development and will not cooperate in a collaborative approach to Public transport and rights of way into and out of Harlow.

Infrastructure for Epping documents IDP ED117/ED118 only lists two things as critical for Epping Lindsay Street Sub Station and Thames Water Waste Network but no costs are estimated or timescales given for them. Other items are listed as "Essential" have estimated cost and timescales, they are mainly junction improvements along the B1393 at Station Rd/High Street/St

Johns Road £2,000,000 in 2026-2031, Theydon Road £1,000,000 in 2026-2031, Bury Land £1,000,000 in 2026-2031, Thornwood Road Signals £1,000,000 in 2020-2025 and a Left turn lane from the A121 at the Wake Arms roundabout onto the B1393 towards Epping but again no cost is estimated or timescale given for this. Although these junction improvement would no doubt help somewhat and be welcomed they do not in themselves increase the capacity of the B1393 road. At present traffic diverts around the queues along Epping High Street via so called rat runs along Theydon Road/Ivy Chimneys/Bridge Hill/Brook Road/Bower Hill/Stewards Green Road, Coopersale Street and Stonards Hill, also Bury Lane and Lindsay Street as well as Hemnall Street and Clarks Lane. Most of these roads mentioned as rat run are proposed to be designated as "Quiet ways" with Cycle lanes introduced on to them that will further limit their capacity and force through traffic to queue along Epping High Street adding to the air pollution in the town, which already has higher than the national average air pollution levels thanks to the nearby M25 and M11 Motorways that meet just near the proposed new Epping South EPP.R1 and EPP.R2 housing development sites.

The currently adopted Epping Local Plan required at least one off street parking space be provided for each new dwelling, but this new proposed Local Plan is removing that requirement. Off street parking space is required to be provided this is not just for parking of polluting Internal Combustion Vehicles but will increasingly be required for the charging and storing of more environmentally friendly Electric Vehicles both Cars and Bikes. As EFDC has declared a climate emergency all new homes should be required to provide at least one off-street space for storage and charging of electric vehicles and electric charging points for each space are a made planning condition of all new developments.

Flooding and rain water discharge, The Example maps in the part L of the plan for South Epping sites show multiple SUDs Sustainable Drainage Ponds that would be required to drain into the brooks and watercourses that already cross the sites and flow along adjacent to Brook Road and Stewards Green Road. These brooks already occasionally flood in times of high rainfall as existing flood maps show and they flow into the river Roding which also regularly flood around Abridge.

The bund/bern or Sound Protection Barrier Proposed for the South Epping Site EPP.R1 and EPP.R2 is not adequate to protect new and existing local residents from noise and air pollution. The maps included show there would be a gap where the Central Line Railway crossed the M25 motorway so noise and air pollution would leak through as the included noise map already shows. The noise map only shows noise levels for daytime when exactly is that, this should be updated to show at peak Motorway usage times and also noise levels at night. Also air pollution level maps should be included to show actual air pollution levels recorded now and predicted levels at peak times. Replacing agricultural land that is used to now to grow crops that take in carbon dioxide with new homes and occupiers that produce carbon dioxide right next door to one of the most polluting roads in the country is not a good idea for local residents or our planet!

Public rights of way and cycle paths mentioned in documents IDP ED117/ED118, talk of proposed routes between Towns and Villages, e.g. Epping and Theydon Bois but what discussions have been had with land owners/farmers whose land these paths cross. I believe Great Gregories Farm is in some way associated with if not owned by the Corporation of London, owners of Epping Forest Special Area of Conservation. I can't see they would welcome any paved cycle paths crossing their land or fields that presently have styles or gates to contain livestock.

Signature: Martin Russell and Harold Russell Date:  
23/09/2021