

Stakeholder Reference:

Document Reference:

Part A

Making representation as Resident or Member of the General Public

Personal Details		Agent's Details (if applicable)	
Title	Mr		
First Name	Martin and Harold		
Last Name	Russell		
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Organisation (where relevant)			
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Part B

REPRESENTATION

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

MM no: 78

Supporting document reference: ED147A and Inspectors Notes ED141 12/6/22

Do you consider this further 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? Positively prepared,Effective,Justified

Please give details of why you consider the further Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise and concise as possible. If your response exceeds 300 words please also provide an executive summary of no more than 300 words. 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.

Object to Policy P1 Part B We Object to the insertion of “a minimum of”450 homes this would be a licence allowing developers to increase the number of homes and taken with the decision to introduce a build to line on site EPP.R2 would lead to an increase in the housing density that would result in an unacceptable and out of character development. EPP.R1 and EPP.R2 sites are on the very edge of the developed land around Epping, currently green belt farmland and are therefore unsuitable for high density high rise flats. Epping will have too many flats if the St Johns Road redevelopment goes ahead and we feel the sites at EPP.R1 and EPP.R2 should not be overdeveloped with high density housing adjacent to green belt land and out of character with the surrounding mainly two storied family homes.

Object to Part J the removal of “must comply with” to be replaced with “should be accompanied by” is a watering down of the development requirements that should not be allowed happen.

Policy P1 Part K (i) Again we object to the insertion of “a minimum of” 450 homes this would weaken the previous reduction in housing numbers for the sites EPP.R1 and EPP.R2 for which the previous planning inspector Philips already had concerns as to whether the housing densities specified for sites was achievable. To introduce a minimum number of homes without defining a maximum would be a dangerous precedence to set.

Part K (ii) has already removed the phrase “a new neighbourhood centre to include” appropriate community and health facilities, employment and retail uses so this would result in any new facilities not being provided within or close proximity to the sites EPP.R1 and EPP.R2 and the location of the sites at the bottom of a very steep hill on the furthest edge from the town centre. Part K should be strengthened to clearly define the requirements needed to be provided to allow for development of the sites. Epping already needs more NHS GP Doctors and Dentists, also highways improvements to increase capacity at Wake Arms roundabout, Theydon Road T Junction and Epping Road Traffic lights along the B1393 either side of Epping town and any new developments would only make these issues worse unless developer contributories are prerequisites for any new developments in Epping.

New Part after xiii “land to the South of the ‘build to’ line in EPP.R2 within the Masterplan Area must be retained for public open space or for other appropriate uses as agreed through the masterplanning process;” The land to the South of the build to line in EPP.R2 is the sloping land that would be unsuitable as a replacement for the current site of Brook Road Recreation Ground (Action 19) which is on level ground and easily accessibly to current residents neighbouring the existing site. This site should be protected in the local plan to provide public open space or a SANG (Suitable Alternative Natural Greenspace) for existing and new residents of the proposed residential sites EPP.R1 and EPP.R2

Why do the following points need to be removed? Have these been moved to another part?

These are valid concerns that should be taken in to consideration in the new local plan.

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;

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

Please set out what change(s) you consider necessary to make the further 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 and concise as possible. If your response exceeds 300 words please also provide an executive summary of no more than 300 words.

Map 5.1

South Epping Masterplan Area Map

Addition of 'build to' line on map (as outlined in MM78, New part after (xiii))

Build to Line shown in ED147A is brown on yellow is hard to see and not clear as to which side of the line development is planned. This should be made clear and not be hidden from view as is currently the case. ED147A-Revisions-to-Mapping-Part-One-Oct-22.pdf Brown line on yellow map why not reduce the EPP.R2 area to make it clear which part is to be developed upon and which to remain undeveloped. Also the map should be modified to include the location of the Brook Road recreation area to preferably keep it in its current location on flat level ground.

Revise Policy P1 Part K (i) to set a Maximum Number of homes and clearly define the housing density required and house types to fit that number.

Signature: Martin and Harold Russell Date:
09/12/2022