



Representation to Submission Version 2017 Epping Local Plan

Iceni Projects Limited on behalf of
Tele Lands Improvement Limited

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1. INTRODUCTION

- 1.1 This representation is made on behalf of Tele Lands Improvement Limited (Lands Improvement) who in July 2017 acquired a significant interest in a land holding known as Copped Hall Estate, to the northwest of Epping Town.
- 1.2 Lands Improvement considers there are serious flaws with the approach taken to the Submission Version Local Plan which result in a plan which is neither legally compliant nor sound. The following report (and attached forms submitted with these representations) identify the failings of the Submission Version Local Plan and identifies that significant further work is required to support the Local Plan process to undertake an assessment of reasonable alternatives.
- 1.3 Lands Improvement considers that this Plan is not ready for submission, as the lack of appropriate evidence base affects the appointed Inspectors ability to undertake due process in the assessment of the Plan, and that the spatial strategy should be reconsidered to provide a forward-thinking, infrastructure-led spatial strategy for Epping in accordance with the vision for the town.

2. RELEVANT BACKGROUND

- 2.1 Land Improvement's landholding covers approximately 486ha and is located to the north, north-west and west of the town of Epping. The majority of the site is undeveloped, is allocated as Green Belt and is located outside the settlement boundary of Epping. Uses on the site include eight 8 farms, 21 houses, a sports club (Epping Sports Club), 4 allotments and ancillary uses such as highway verges and amenity land. Whilst the site lies outside the settlement boundary, it adjoins large sections of it.
- 2.2 A Promotional Planning Brochure (contained at **Appendix A1**) was submitted to Epping Forest District Council in May 2016 on behalf of the previous landowner, as part of the Preferred Options Local Plan Regulation 18 Consultation. The document promoted four different land parcels, including the two land parcels either side of Bury Lane. Prior to this submission, the entire landholding was assessed through the 2012 SLAA as being suitable (outside of current Green Belt policy) and deliverable. Significantly, the SLAA summary noted that whilst the site was exceptionally large, with a range of constraints identifying individual parts of the site, including wildlife sites, areas of Flood Risk, Listed Buildings and Green Belt, smaller parcels of site could be suitable or a more substantial masterplanned development.

Infrastructure-led Spatial Strategy for Epping

- 2.3 The High Street in Epping is currently constrained by traffic and parking, provides a high quantum of A3 use over any other retail use, has very limited employment opportunities, and has environmental issues with respect to air quality. Development in the town has historically been brownfield and therefore provides no large-scale infrastructure solutions for Epping. The current spatial approach for Epping in the Submission Version of the Local Plan does nothing to rectify these fundamental structural, physical or environmental issues, nor provides any infrastructure to meet the community's aspirations for the town¹.
- 2.4 Among the reasonable alternatives that should have been examined is a highways and air quality solution for Epping, for example a relief road to the north of Epping. This solution would help relieve the High Street and reduce traffic congestion and air pollution. This forward-thinking, short, medium and long term, infrastructure-led spatial strategy for Epping would provide significant benefits for the town and it is simply not sound to not have considered this obvious and logical solution within the Plan making process as a reasonable alternative.

¹ As identified in the Neighbourhood Plan Survey 2016.

- 2.5 The Epping Town Centre Strategy, Western Relief Road and High Street Feasibility Study (dated August 2015), obtained through a Freedom of Information Request, which were undertaken by Essex County Council on behalf of Epping Forest Council, examine the option of a relief road and show that this would provide significant benefits for Epping (held at **Appendix A2**). However, this relief road is not mentioned in the Submission Version Local Plan evidence base or considered as a reasonable alternative at all.
- 2.6 The delivery of a relief road offers potential for Epping to be a more vibrant town with potential for growth to be knitted into the existing fabric and create a more cohesive settlement in accordance with the vision for the town and provide the right type of growth to address the problems associated with the town. This infrastructure led approach would provide a forward-thinking long-term solution for Epping based on the principles of sound plan making and forward planning.

Epping Sports Club

- 2.7 The Epping Sports Club, to the east of Bury Lane, and an area to the west of Bury Lane were previously allocated for a linked development in the Regulation 18 Version of the Epping Local Plan (SR-0113B), but have been removed from the Submission Version (a Site Plan is provided at **Appendix A3**). The reasoning for this decision to remove the sites from the current spatial strategy for Epping has not been provided by the Council, neither within the Submission Version Local Plan, associated technical documents or Cabinet Reports.
- 2.8 The Epping Sports Club is ageing and there is no room for the necessary growth and expansion of the sports clubs who currently use this facility to enable them to serve the existing and future population of the town. The existing site experiences significant difficulties with access and parking, especially as it is located adjacent to the Epping St John's School. The previous allocation within the Regulation 18 Local Plan (2016) would have allowed for new and expanded sports facilities being provided for Epping, which would deliver much needed new sports and recreation infrastructure for existing and future residents, within walking distance from the High Street, in a central location and in accordance with the vision for the town. In addition, the proposal would mitigate the access issues currently experienced by the school and sport club by providing new car parking and school drop off/pick up facilities.
- 2.9 In October 2017, Lands Improvement wrote to the Council outlining their intention to relocate the existing sports club and provide improved and expanded sporting facilities for Epping. A copy of this representation is held at **Appendix A4**.
- 2.10 The decision by the Council to remove the Epping Sports Club and associated land is not identified within in the Submission Version and new evidence base released in late 2017. We consider the

removal of the allocations illogical, irrational and wholly unsound. Furthermore, we consider that the removal of the site allocations to be a major missed opportunity for Epping.

3. LEGAL COMPLIANCE

- 3.1 Denton's have undertaken a legal review of the evidence base associated with the Submission Version (held at **Appendix A5**). This identifies that there are serious legal issues with how the Sustainability Appraisal (EB204 and EB204) has been undertaken and that the local community and stakeholders, including Lands Improvement, have not appropriately been involved in the consultation process to date, nor are we in a position to engage properly even at this junction of the plan making process, given the amount of missing information within the evidence base documentation.

Sustainability Appraisal and Habitats Regulation Assessment

- 3.2 Denton's note highlights that the Sustainability Appraisal (EB204) provides a flawed assessment of reasonable alternatives and does not present the proper evidence base on which to conclude that the plan meets relevant EU law. The scoring in the Sustainability Appraisal (EB204 and EB204) is not transparent, nor able to be replicated. The Appraisal does not run all the Local Plan alternative options alongside each other using a single matrix and the options are not examined at the same level of detail. Therefore, the assessment of Option A, B and C is not a fair or complete comparison. Additionally, no appraisal has been undertaken of the HMA-level distribution of housing growth.
- 3.3 Option B is predicated on higher housing numbers than the other options and a 'Further Hybrid' option of delivering those same numbers spread more evenly towards the Central Line does not appear to have been tested. Although no combined scoring is stated for each option (because of the absence of a scoring matrix), Option B performs worst when scores are added (using the lowest overall score for best performance). Option A is best, followed by Option C.
- 3.4 It is also clear from the Sustainability Appraisal that there are significant doubts about the environmental effects of the preferred option (and those alternatives that have been considered). There are many instances in the report where the effects are not fully known and scores the position in terms of "significant effects" as "?". Therefore, the impact is not known and the assessment of all reasonable alternatives has not been addressed at the same level of detail for the SEA and Habitats Regulation purposes. It is on this basis, that the Submission Version is unlawful as well as being unjustified, as it does not appropriately consider the reasonable alternatives or environmental effects.

Lack of Information

- 3.5 The following information has not been provided with this public consultation:
- Updated transportation evidence base, identifying likely highways effects of Options A, B and C and the preferred hybrid option.

- Updated Air Quality and nitrogen deposition evidence base, based on updated transport analysis.
- Appendix B1 of the Site Selection Report (EB802B) outlining the decision taking made with respect to allocated sites.
- Any substantiated explanation as to how the Green Belt Assessment has been reconsidered for the southern expansion in Epping to support a change from a poor option to a good option in terms of green belt harm.
- No information in the Highways Assessment Report (EB502)² and Infrastructure Delivery Plan (EB1101A and EB1101B)³ with respect to proposed highways works and social infrastructure delivery. Therefore, there are likely to be additional costs in the Infrastructure Delivery Plan that aren't identified yet. This demonstrates that the Council have not completed the work and therefore have not undertaken due process.

3.6 Therefore, there is currently inadequate published evidence on which to base conclusions that the preferred option is the most appropriate strategy in transportation, air quality and habitats terms. This is unlawful and procedurally wrong. The Local Plan process is required to be front loaded and supported by an evidence base that is publicly available. The lack of evidence base on decision taking by the District does not encourage participation in the planning process on an informed or engaged basis and is therefore unsound, and unlawful.

3.7 In addition, the approach constitutes poor plan making which has not unsurprisingly led to the wrong outcomes, as identified in the following sections.

Neighbourhood Plan

3.8 The Site Selection Report (EB802A) identifies that amendments have been made to the spatial strategy around Epping Town from the Regulation 18 Version of the Local Plan (2016) to the Submission Version of the Local Plan for the following reasons:

² Many of junctions in Epping High Street are currently over capacity but have not been analysed by the County Council for the Submission Version. Therefore, the solution to highways is not provided nor costed in the Submission Version and associated Infrastructure Delivery Plan.

³ The Infrastructure Delivery Plan makes no allowance for additional social infrastructure or costs associated with delivery of the South Epping Masterplan Area.

“Focus on non-urban brownfield sites to the south of the settlement ensured greater alignment with the emerging Neighbourhood Plan and provided greater critical mass and potential for new and improved infrastructure.”

- 3.9 This approach is unlawful and unsound, as it is not appropriate to have a Local Plan led by a Neighbourhood Plan, given the evidence base for a Neighbourhood Plan has not been derived by through evidence of environmental performance and sustainable development. This is also unlawful, as the Submission Version seeks conformity with a lower order plan that is legally required⁴ to be in general conformity with the Local Plan which has a significantly higher examination threshold.
- 3.10 It is also noted that the Draft Epping Neighbourhood Plan has not yet been published. The only publicly available information is the resident questionnaire from 2016⁵ and therefore the spatial strategy for the Neighbourhood Plan has not yet been defined, let alone assessed.

⁴ Under Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990

⁵ This survey determined that the most important traffic issue for residents in Epping was congestion on the High Street and that growth in Epping should only come forward if accompanied by appropriate infrastructure provision.

4. LANDSCAPE AND GREEN BELT ASSESSMENTS

4.1 Whilst Lands Improvement support the release of Green Belt to achieve growth in the District, the landscape and Green Belt evidence used to support the Submission Version does not provide a robust evidence base for decision taking with respect to the location of Green Belt release and the development choices reached. Moreover, in our opinion the approach followed is deeply flawed for the following reasons:

- The Settlement Edge Landscape Sensitivity Study (EB712) is out of date⁶ in terms of the methodology adopted and the current thinking in relation to concepts of susceptibility and analysis of sensitivity as it relates to specific proposals.
- The assessment and analysis undertaken in the Settlement Edge Landscape Sensitivity Study (EB712) is not in accordance with the methodology described by Chris Blandford Associates within the report. As a result, the conclusions are unsupported by proper evidence and analysis. The conclusions drawn cannot be verified and therefore should not be relied upon in the decision making.
- The Green Belt Stage 2 Assessment (EB705A) does not allow for consideration of how smaller, discrete parcels contribute to the Green Belt that may be suitable for further consideration for release. Instead, a combination of both small and extremely large parcels are assessed. This serves to skew the findings in favour of the smaller parcels and does not allow proper consideration of the contribution that the settlement edge of larger land parcels make or do not make to the Green Belt. For example, the land to the west of Bury Lane allocated within Regulation 18 Local Plan in conjunction with the Epping Sports Club, is located within a much larger parcel (069.3) without any consideration as to the mitigation and landscaping proposed for this allocation and therefore unfairly skews the Green Belt Assessment of this parcel.
- The Green Belt Stage 2 Assessment (EB705A) does not take the next step and make recommendations as to how the release of parcels, or land within them, may be achieved. Whilst boundaries are identified, these are not considered alongside an assessment of suitability of land for release to identify robust, permanent and defensible green belt boundaries that will endure beyond the plan period, in line with the Local Plan spatial strategy and as required by the NPPF. The identification of parcels has been entirely based on landscape features with no regard given to development proposals and land ownership, and are therefore considered to be unfairly aggregated and weighted. There is no evidence that the harm to the Green Belt cannot be

⁶ With respect to published guidance from LI/IEMA(GLVIA 3).

suitably mitigated through the incorporation of sensitive design measures for Options A and C in the way that it seems to have been applied for the Hybrid Option in the Sustainability Appraisal.

- The Green Belt Stage 2 Assessment (EB705A) is overly reliant on subjective assessment without measurable, transparent and replicable criteria and parameters and does not clearly define a set of measurable parameters for each of the purposes against which to assess the contribution of a parcel to the Green Belt.

4.2 On this basis, the location of Green Belt release within the Submission Version is considered unsound for the following reasons:

- It is not justified as it is not based on a robust evidence base and it is unclear how each parcel to be released is ranked in terms of Green Belt impact and how these compare between allocated sites⁷, such that it is unclear whether the Submission Version is the most appropriate strategy in terms of Green Belt release. In Epping for example, the South Epping Master Plan area is deemed to have a Very High impact if removed from the Green Belt but was chosen for allocation over sites which are deemed to have high, moderate, low and very low harm if released from the Green Belt. A further example at Epping is the Epping Sports Club, which is identified as having a very low level of harm but has not subsequently been released from the Green Belt and the development allocation discarded. By this rationale, it would seem appropriate to also remove all parcels identified at Very High harm from the Green Belt, rather than lower impact sites. In fact, it would appear for the District as a whole, the Council have ignored the land recommended for release under the Green Belt reviews and have allocated alternate parcels, which is neither objective nor rational (refer to **Appendix A6**).
- It is not consistent with the NPPF with respect to Paragraph 85 which requires Local Planning Authorities to be satisfied that Green Belt boundaries will not need altering at the end of the development plan period. The Inspector for the Welwyn Hatfield Local Plan Examination clearly identifies that land should be safeguarded to be used for development after the plan period (refer to **Appendix A7**). It is evident from the Government's AON figure of 923 dwellings per annum, which the Plan does not plan for, greatly exceeds the Council's AON figure of 518 dwellings per annum provided for in the proposed Submission Version. Accordingly, further Green Belt release is certain to be required at the end of the plan period and certain to be required as part of a Local Plan review within the next five years. The Submission Version has not given any consideration to this point and no consideration to the long term growth locations. Accordingly, the Plan is not

⁷ In addition, Appendix B1 of the Site Selection Report has not been prepared and therefore there is no justification for why sites have been chosen for release from the Green Belt and the spatial strategy in the Local Plan is not justified.

consistent with national planning policy, it has not been positively prepared and it is neither justified nor effective.

4.3 This affects the following sections of the Submission Version:

- Policy SP2: Spatial Development Strategy 2011-2033.
- Policy SP6 Green Belt and District Open Land.
- Policy DM3 Landscape Character, Ancient Landscapes and Geodiversity.
- Policy DM4 Green Belt.
- Policy P1 Epping.
- Paragraphs 2.66, 2.134, 2.142, 4.31 and 4.32.
- Map 2.5 Green Belt Boundary Alterations.

4.4 With over 92% of the District designated as Metropolitan Green Belt, the Council should have ensured that the Green Belt and landscape assessments were appropriate to inform the Submission Version and applied a methodology which was fit for purpose that considered the likely levels of development required in the District. It is therefore recommended that the Plan is suspended until an appropriate assessment of the Green Belt is undertaken.

5. DISTRICT WIDE SPATIAL DISTRIBUTION OF GROWTH

- 5.1 Epping is one of the Borough's largest town and is correctly identified in the District's settlement hierarchy as a main town. Given its connectivity to public transport and strategic highway infrastructure however, we consider that the town's potential to sustainably accommodate growth has been underplayed, with low levels of growth identified (only 1,305 homes) relative to the wider Plan.
- 5.2 It is our contention that the levels of growth identified for Epping to be insufficient for one of the most sustainable locations in the Borough and that the Council's strategy has skewed large amounts of growth away from one of the most sustainable locations to areas that are far less sustainable, such as the peripheral locations identified for urban extensions on the edges of Harlow.
- 5.3 The Council's identified growth locations around Harlow are presented as a linked Garden Town, but in reality, the extensions have a very weak spatial relationship with one another at best and through three separate and distinct extensions, they fail to deliver the sustainability benefits that a community of circa 4,000 homes could deliver if delivered in one location. Furthermore, the identified locations are remote from the Harlow town centre, remote from the rail network and will likely lead to greater car usage.
- 5.4 The vision for the District outlined in Paragraph 2.27 requires homes to be delivered in the most sustainable locations. The Plan is unsound on the grounds of being not positively prepared, effective or justified because it simply does not do this.
- 5.5 Figure 1.1 of the Submission Local Plan (contained at **Appendix A8**) is a diagram that denotes the transport infrastructure and key settlements in the District, which provides a good starting point for locating growth. In comparison, Map 2.5 of the Local Plan (also contained at **Appendix A8**) shows the areas that have been proposed for Green Belt release to accommodate significant development.
- 5.6 It is apparent from these two diagrams that there is an extremely weak level of synergy and spatial alignment between the key infrastructure/settlements and land being removed from the Green Belt to accommodate significant levels of growth. This reveals that sustainability and sound plan making was absent in key decision taking and spatial choices at the heart of the spatial strategy presented in the draft Plan.

6. FIVE YEAR HOUSING LAND SUPPLY

- 6.1 The housing distribution across the District within Policy SP2 has been modified, generally resulting in a reduction of dwellings across most settlements. Furthermore, the spatial strategy for each settlement has changed dramatically. The Submission Version is now heavily predicated on the release of large scale strategic masterplan areas which will have implications on the early delivery of housing in the District and the District's five year housing land supply (5YHLS).
- 6.2 At this point in time, our assessment of the Council's 5YHLS position in the Submission Plan shows that from April 2017 to March 2022, the Council can only demonstrate a **3.72 years supply**⁸.
- 6.3 The Council have an identified a net capacity of 9,816 dwellings coming forward over the entire plan period (from a total of 88 allocations), of which 6,766 dwellings are envisaged to come from draft Masterplan Areas and 327 dwellings from the two Concept Framework Plan Areas. This demonstrates an over reliance on larger strategic sites to deliver the quantum of housing required up to 2033 (comprising 72% of all draft residential allocations within the Local Plan). Therefore, there is very limited deliverable smaller scale sites identified in the Submission Version of the Local Plan.
- 6.4 Within Epping Town specifically, eleven sites have been allocated to bring forward 1,305 dwellings over the plan period of which 73% of this delivery will come from the South Epping Masterplan Area (outlined for 950 dwellings).
- 6.5 The proposed spatial strategy within the Submission Version is therefore unsound for the following reasons:
- It is not positively prepared as it does not meet the short-term housing requirement of the District;
 - It is not justified or effective, as it is not the most appropriate spatial strategy to deliver housing in the short term, especially considering that the Council had a spatial strategy within the Regulation 18 Local Plan which was geared to improving housing delivery as quickly as possible, through a reliance on smaller more deliverable allocations and this is considered reasonable and superior necessary strategy in light of the shortfall; and

⁸ It is noted that the Housing Trajectory in Appendix 2 of the Housing Implementation Strategy is incorrect with respect to the phasing of housing identified between 2017-2022 and differs from the Housing Allocation Phasing within Appendix 4 of this report. Appendix 4 has been relied upon for our assessment of the 5YHLS position.

- It does not conform with the delivery of sustainable development in accordance with the NPPF.

6.6 This affects the following sections of the Submission Version:

- Policy SP2: Spatial Development Strategy 2011-2033.
- Policy H1 Housing mix and accommodation types.
- Policy P1-15 with respect to the specific allocated sites in each settlement.
- Paragraphs 2.60, 2.61, 2.62, 2.63, 2.66, 2.134 and 2.142.
- Map 2.5 Green Belt Boundary Alterations.

6.7 We recommend that the plan is amended to allocate additional smaller scale sites which are easily deliverable to support the 5YHLS position in the District. The Council's previous spatial strategy within the Regulation 18 Local Plan and the sites allocated through it, constitutes a spatial approach that could address 5YHLS quickly and should therefore be reconsidered.

6.8 We recommend that the following allocation should be re-allocated through the Local Plan (as shown in the plans held at **Appendix A9**):

- Reinstate the Epping Sports Club allocation which would allow for housing to be provided on a site which was assessed as having a low impact if released from the Green Belt and supports benefits in the way of new and improved sports facilities in Epping.

6.9 If further sites are required to demonstrate a 5YHLS, the following sites should be allocated given their ability to deliver the following housing quantum within a 5 year period.

Site	Map at Appendix	Dwelling Delivery Yield 2018-2023
Wider Bury Lane (including sports club site and relocation site west of Bury Lane)	A5	200
Bury Lane and sites to west (including sports club site and relocation of sports club) including new link road between High Road and Bury Lane.	A11	500
Land to the north of Lindsey Street.	A12	300
Land to the north east of Lindsey Street including new link road between Lindsey Street and High Road.	A13	600

7. EPPING TOWN SPATIAL STRATEGY AND ALTERNATIVE OPTIONS

Current Epping Town Spatial Strategy

Vision for Epping

- 7.1 The High Street in Epping is currently constrained by traffic and parking, provides a high quantum of A3 use over any other retail use, and has very limited employment opportunities, such that most residents need to leave Epping to access services and facilities⁹ and employment (usually to London), thereby creating a dormitory town during the week.
- 7.2 The Submission Plan provides a new vision for Epping (pg 115) suggesting that Epping Town will become a thriving town centre with a mix of retailers, social infrastructure and employment opportunities, and that air quality impacts will be “mitigated”. However, the spatial development strategy proposed for Epping in the Submission Version does nothing to address the inherent physical or structural problems within the town centre, does not support the community aspirations¹⁰ and does not alleviate the traffic or air quality problems in Epping.

Social Infrastructure

- 7.3 No social infrastructure is identified within any of the residential allocations within Epping under Appendix 6B of the Submission Plan, and this has serious implications with respect to the Infrastructure Delivery Plan and the levy of Section 106 contributions. It is noted however that if key town centre facilities such as sports clubs or retail facilities were to be relocated to the South Epping Master Plan area, this would detract from the High Street and would force existing residents to drive to these facilities, resulting in less sustainable travel patterns.
- 7.4 Where Green Belt land is proposed to be released in Epping, the Council should have made best possible use of this land. The proposed South Epping Master Plan area does not make the best use of the site, as it does not provide any employment use, strategic highways infrastructure, additional social infrastructure or assist in reducing air quality impacts in the District. Therefore, the proposed spatial strategy is completely at odds with the vision for Epping as defined in the Submission Version of the Plan.

⁹ As demonstrated by the Neighbourhood Plan Survey.

¹⁰ This survey determined that the most important traffic issue for residents in Epping was congestion on the High Street and that growth in Epping should only come forward if accompanied by appropriate infrastructure provision.

7.5 In addition, the allocation of the Epping Sports Centre allocation (EPP.R5) does not identify an appropriate relocation site. Given the constraints of the Town Centre, it is highly unlikely that this relocation site will be in an easily accessible location. This facility was considered critical to the recreation requirements of the town centre and beyond, in accordance with the Built Facilities Strategy (EB710), and it is considered unsound to remove this facility from the town centre. Therefore, it is considered that the proposed allocations are not positively prepared, as they do not provide for the social infrastructure and recreation needs of the existing and incoming residents.

Highways and Air Quality

7.6 A review of the Highways Assessment Report (EB502) and Infrastructure Delivery Plan (EB1101A and EB1101B) shows that congestion in Epping will significantly worsen as a result of the proposed Local Plan development. Of note:

- The Theydon Road/High Road junction is operating at up to 159% of capacity without improvements and traffic generated by the Submission Version allocations. It is noted, that this junction is the main access point for the South Epping Masterplan Area and is also in close proximity to the Bell Common Air Quality Management Area. Whilst we understand that the junction is proposed to operate at 94% of capacity with improvements, the transport evidence provided does not identify what these improvements are beyond noting that they involve local widening, which is likely to require third party land.
- The Bury Lane/High Road junction is operating up to 184% of capacity without improvements and additional traffic generated by the Submission Version allocations. There is no assessment of improvements at this junction.
- The Station Road/St John's Road junction is operating at up to 173% capacity with the Local Plan development traffic and no highway improvements are identified or tested.

7.7 In addition to the above, there is no detailed Public Transport Strategy that accompanies the Submission Version, nor is it evident how the modal shift expected by the Submission Plan will be achieved.

7.8 It is apparent from the evidence base that congestion in Epping will significantly worsen as a result of the Submission Version of the Local Plan and that no solution has been identified to resolve this. This is likely to result in extensive queuing and delays, possible safety issues and a deterioration in air quality in the town centre and can therefore not be justified.

Alternative Epping Town Spatial Strategy

7.9 As identified above, the Submission Version spatial strategy for Epping Town does not accord with the vision for Epping and does not align with the community aspirations to fix the problems in Epping

with respect to highways or air quality impacts. It is uninspiring and does not make any attempt to improve the structural, physical or environmental problems with the town centre.

- 7.10 Among the reasonable alternatives that should have been examined is an air quality and highways solution for Epping, for example a relief road to the north of Epping. This solution would help relieve the High Street of HGV's and reduce traffic congestion and air pollution in the High Street, including positive impacts on the Air Quality Management Area. It is simply not sound to not have considered this obvious and logical solution within the Plan making process as a reasonable alternative.
- 7.11 The Proposed Alternative Epping Strategy Plan held at **Appendix A13** provides an indication of the likely route for a relief road, and considers the development potential to the north and north east of Epping. This proposal offers potential for Epping to be a more vibrant town with potential for growth to be knitted into the existing fabric and create a more cohesive, vibrant settlement. This option would provide the opportunity to improve the High Street by redistributing the carriage way (or pedestrianizing the High Street if desired), formalisation of the market area and rationalisation of car parking and bus stops within the town centre. The solution can be delivered through a different spatial approach for the level of growth identified for the settlement.
- 7.12 This infrastructure led approach would provide a forward-thinking long-term solution for Epping based on the principles of sound plan making and forward planning. In this regard, we consider that the Vision for Epping should be rectified as follows:

Epping will become a vibrant town centre providing excellent community facilities, services and transport connectivity by taking account of, and mitigating, impacts associated with air pollution and traffic congestion.

Development needs in Epping, including the provision of new homes and community infrastructure, will be met in the most sustainable locations, balancing the use of existing infrastructure, the ability to deliver new infrastructure, minimising adverse impacts on the natural and historic environment, by making best use of any Green Belt released to support growth and maintaining the Metropolitan Green Belt where it continues to make a contribution to its nationally defined purposes.

Future development in Epping will compliment and enhance the look and character of Epping by being knitted into the existing fabric of the town to the north and west, providing significant infrastructure in the form of a relief road which will remove traffic from the High Street and significantly improve air quality in the town centre, and the provision of new and replacement community and recreation infrastructure in a central and accessible location, close to the town centre. The High Street will be improved through pavement widening, landscaping and greening and potentially partial pedestrianisation, in order to support the expansion of the existing market

and public open space in the town centre, making it a place people want to live, work and play. Future development in Epping will support the viability and vitality of the town, making it more attractive to national and local retailers alike. Other forms of town centre uses, including residential, cultural, leisure tourist and commercial activities will be encouraged.

Epping will be a town that can be accessed by public transport, walking and cycling as an alternative to the car, and will support the local community and the promotion of healthy lifestyles.

Highways and Air Quality

- 7.13 The Epping Town Centre Strategy, Western Relief Road and High Street Feasibility Study (dated August 2015), obtained through a Freedom of Information Request, which were undertaken by Essex County Council on behalf of Epping Forest Council, identify that a relief road would provide significant benefits for Epping (held at **Appendix A2**).

Sustainable Development

- 7.14 We have run both spatial development options, the South Epping Master Plan area and the relief road option to the north/north west of Epping, through the Sustainable Development Scorecard¹¹.
- 7.15 National Planning Policy has running through it 'the golden thread of sustainable development'. The Sustainable Development Commission (SDC) was set up in April 2016 to address the fact that there was no clear-cut, NPPF based assessment criteria to consider a site or project's sustainable development credentials. Chaired by former Planning Minister, Nick Raynsford, the SDC was made up of a balanced cross-section of industry professionals, who have produced an assessment tool which seeks to bring clarity to the contested concept of sustainable development – the Sustainable Development Scorecard. The Scorecard is intrinsically based within the context of the NPPF and its three equal pillars of environmental, economic and social.
- 7.16 **Appendix A14** provides the Scorecards for both spatial development options for Epping. This shows that the allocated South Epping Master Plan area gives a Sustainability Score of 69% with a Parity Score of 70%, whereas the Epping North West option gives a Sustainability Score of 77% with a Parity Score of 80%. Therefore, the north west spatial option can be said to give a better contribution to sustainable development, whilst providing a more equal balance across the three pillars of economic, social and environmental sustainability. The key reasons for this are as follows:

¹¹ <https://thescorecard.org.uk/>

- The proximity of the M25 to the southern sites gives rise to highways, associated air quality and noise issues, not prevalent in the north west sites.
- The north west sites involve the delivery of the relief road, which provides infrastructure benefits to the area.
- The north west sites are also closer to the bus routes serving Epping High Street.
- The proximity of Epping High Street to the north west sites means that residents are more likely to walk to local services and amenities.
- The integration of the sports/recreation facilities within the north west sites also mean that new residents are more likely to make use of them, without them being remote from existing residents.

7.17 Overall, it is clear that the current spatial strategy is not appropriate for Epping as it does not address the inherent structural, physical and environmental problems with the town centre, nor provides a solution to these problems. Lands Improvement consider that the relief road alternative should have been considered by the Local Plan to address the significant traffic and air quality problems facing Epping. We propose a solution that is forward thinking, infrastructure led and could significantly improve the character and feel of the town centre.

A1. LAND TO THE NORTH AND NORTH WEST PROMOTIONAL DOCUMENT

**A2. EPPING TOWN CENTRE STRATEGY, WESTERN RELIEF ROAD
AND HIGH STREET FEASIBILITY STUDY (AUGUST 2015)**

A3. SR-0113B SITE LOCATION PLAN

A4. LETTER OF SUPPORT FOR EPPING SPORTS CLUB ALLOCATION

A5. LEGAL REVIEW PREPARED BY DENTONS

**A6. GREEN BELT ASSESSMENT VERSUS RELEASE MAP PREPARED
BY LANDS IMPROVEMENT**

A7. WELWYN HATFIELD INSPECTORS GREEN BELT REPORT

**A8. SUBMISSION PLAN SPATIAL DISTRIBUTION OF GROWTH
VERSUS INFRASTRUCTURE DISTRIBUTION**

A9. SPORTS CLUB FRAMEWORK PLAN

A10. LAND TO THE WEST OF BURY LANE FRAMEWORK PLAN

A11. LINDSEY STREET FRAMEWORK PLAN

A12. LARGER LINDSEY STREET FRAMEWORK PLAN

A13. RELIEF ROAD FRAMEWORK PLAN

A14. SUSTAINABLE DEVELOPMENT SCORECARDS FOR EPPING GROWTH OPTIONS