

Stakeholder Reference:  
Document Reference:

Part A

Making representation as Resident or Member of the General Public

Personal Details		Agent's Details (if applicable)	
Title	Mrs		
First Name	Melanie		
Last Name	Mckenzie		
Job Title (where relevant)			
Organisation (where relevant)			
Address			
Post Code			
Telephone Number			
E-mail Address			

---

## Part B

---

### 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: No

Sound: No

If no, then which of the soundness test(s) does it fail? Positively prepared, Effective, 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.**

In the planning Inspectors advice after the hearings report of 2 August 2019 (ED98, paragraph 43) it was stated that the sites proposed for the South Epping Masterplan Area (SEMPA), EPP.R1 and EPP.R2, would be subject to a number of constraints. These included The Green Belt and Habitats Regulation Assessment (HRA) considerations, noise and air quality associated with the M25, the presence of overhead powerlines and the need for a road over the railway to connect them. My representations focus on Main Modifications (MM) proposed around the SEMPA (MM78) and why these are unsound with reference to four key areas: sustainable infrastructure, traffic and transport, air quality and Suitable Alternative Natural Greenspace (SANG).

**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.**

Sustainable infrastructure

The development is by far the furthest distance from local amenities & facilities: the high road with the shops, leisure facilities, library and station from any of the proposed sites which were considered. The gradient of the hill is very steep and exceeds guidance set out by Sustrans Charity. The site was deemed suitable for walking / cycling to the above amenities; this is not feasible as the provision of a vehicle bridge joining the 2 areas of land is no longer viable. Therefore there will be no access for public transport to link the two sites either. This will lead to a massive increase in private car use (possibly by as many as 1000 extra cars) on our already overcrowded and congested roads (particularly Brook Road). MM 78 says that 'all development proposals must demonstrate opportunities to access jobs, services, education and leisure opportunities by means other than the car' including 'the need to make provision for, improve, enhance and promote use of existing cycling and walking networks and access to passenger

transport services'. The plan does not currently consider this adequately and there are no guarantees that such vital infrastructure will be delivered. As such, the SEMPA is not positively prepared, not effective, and not consistent with national policy as it will result in under resourced homes and residents in an unsustainable development.

## Traffic and transport

The Planning Inspector highlighted (report dated 2 August 2019 (ED98 para 44) that the site developers have confirmed that it would not be financially viable to fund a vehicular bridge over the railway line that connects the two sites in the SEMPA (EPP.R1 and EPP.R2). MM78 (part K, vi, page 107) confirms this, removing wording around a planned 'vehicular, pedestrian, and cycling bridge' over the railway line, and replacing it with 'vehicular access/egress which provides safe access to the local highway network'. It will mean that the two sites are completely separate which will make the internal road layout impossible: the joining up of the sites either by exiting EPP.R2 onto Brook Road and EPP.R1 onto Bridge Hill /Ivy Chimneys Road will increase the traffic on the already congested and dangerous roads. The roads bordering EPP.R1 and EPP.R2 (Brook Road, Bridge Hill, and Ivy Chimneys) form one of only two entry/exit roads in to and out of Epping. Heavy lorries and other road users use the roads to avoid the busy high road area and as a cut through: the parked cars and narrow roads are, in place, only able to accommodate one car width. The Central Line bridge running across the SEMPA (between Brook Road and Bridge Hill) is on a bend and creates a dangerous bottleneck. Ivy Chimneys Primary School is positioned at one end of the road and Coopersale Hall Primary School (a private school where almost every parent uses a large vehicle to take their child/children too) at the other, and there is particularly heavy traffic at drop off/pick up times.

The construction traffic couldn't use the existing road network to access the site.

This means that the reliance on private vehicles to access the high road, shops, library, leisure facilities will increase dramatically thus the idea of walking/ cycling and other more sustainable travel and reducing reliance on private vehicles in order to reach the high road, station, shops, healthcare etc. is very questionable.

These facilities are some distance from the SEMPA - the greatest distance of all initially proposed sites for consideration - with a hill gradient exceeding those set out in the Sustrans Guidance. The government's climate change committee chairman, Lord Deben, has said that local authorities should not allow new homes to be built where residents already have to commute by car.

With the National Planning Policy Framework (NPPF) stating that 'local planning authorities should plan for development in locations and ways which reduce greenhouse gas emissions', and MM77 stating that a key consideration for development proposals is that there should be viable alternatives to private car use, preventing the establishment of unsustainable travel behaviour, the SEMPA is not positively prepared, not effective, and not consistent with national policy as it will not enable the delivery of sustainable development.

## Air quality

The level of development proposed in the SEMPA is not protecting the forest and our green spaces therefore not protecting us (the residents) from air pollution and its negative effects. The idea that residents would walk or cycle to the high street /shops and other facilities which, up a steep hill, and a mile away is not feasible. Therefore the extra 'residents' cars (possibly 1000 over the two sites) and the extra traffic that the development will generate (due to the fact that the sites are too far from the high street and the facilities of Epping) will generate increased air

pollution, congestion (in its own right making the air quality worse) and additional traffic. Epping Forest District Council have made clear in their response to the Planning Inspector's advice after hearings report (ED133, page 17) that, for a development to be justified, it must demonstrate that there would be no adverse impact on the integrity of the Epping Forest Special Area of Conservation (SAC) and that delivery on development would be delayed until after the results of additional traffic modelling on roads within 200m of the Epping Forest SAC which will be undertaken in 2024/25 in accordance with the adopted Interim Air Pollution Mitigation Strategy.

The SEMPA is not positively prepared, not effective, and not consistent with national policy as it is will have a negative impact on air quality.

### Suitable Alternative Natural Greenspace (SANG)

The SEMPA is close to Epping Forest, the requirement for Suitable Alternative Natural Greenspace (SANG) is enhanced in order to divert people away from the forest. The forest has become increasingly over-crowded throughout the Covid-19 pandemic with people driving considerable distances to visit. Car parks are busy (despite the recent decision to now enforce paid parking restrictions) and the pathways in the forest are rapidly deteriorating in quality. The MMs do not make clear how SANG requirements will be met in the SEMPA, a challenging task given the 'numerous constraints, including Green Belt and HRA considerations, noise and air quality associated with the M25, the presence of overhead powerlines and the necessary acoustic bund adjacent to the motorway' on the sites highlighted by the Planning Inspector in her advice after hearings report (ED98, paragraph 43-44).

The local playing field would also have to be replaced; this was given to the people of Epping as a recreation ground and protected green space.

I do not find the SEMPRA sound or legally compliant. The site poses many challenges which are not feasible and, in my opinion, are not sound or justified as listed below.

The land is split with many owners involved.

The land is located on Green Belt land which the removal of has been deemed as causing a high level of harm (Green Belt Assessment 2016).

The land has no infrastructure to join the two sites.

The land has Ancient Woodland on it and is a habitat for Red Kites and other raptors. The removal of the Green Belt would be catastrophic and is a BAP Priority Habitat Area (identified by DEFRA/Joint Nature Conservative Committee as the most threatened and requiring conservation under the UK Biodiversity Action Plan)

The land has Tree Preservation orders on it.

The land has BPA oil / Gas pipelines within it.

The land has High Voltage Cables on it.

The land has a Grade 11 listed farm on it.

Therefore, given the evidence, the SEMPRA is not justified, given the more suitable alternative sites when first considered, and in no way can the evidence support the plan.

Of the 31 sites initially put forward for consideration in Epping, 15 were not proposed for allocation. According to the site allocation report (<https://www.efdclocalplan.org/wp-content/uploads/2018/03/EB805P-Appendix-B1.6.6-Results-of-Identifying-Sites-for-Allocation.pdf> -

a document initially withheld by the council until a successful legal challenge by CK Properties Theydon Bois Limited), of these 15 non-proposed sites, 12 identified no on-site restrictions or constraints to development. The justification given for not proposing sites included: complex ownership patterns; landscape sensitivity; Green Belt harm; the presence of BAP Habitats and Tree Preservation Orders which would result in reduced site capacity; and that the sites were 'less preferred by the community'.

The consultation process itself, with well over 30 documents spanning 2,704 pages, has made it extremely hard for residents to access. The challenges within the whole procedure over 4+ years has been very difficult with guidance being difficult to understand and the websites/ information being almost impossible to understand.

The Main Modifications webpage was indeed a minefield with no straightforward signposting or clear instructions, thus making any responses from residents very difficult to make clearly. As a key element of sound and legally compliant planning is evidence of participation of the local community, it could strongly be argued that the EFDC local plan is not justified.

Signature: Melanie Mckenzie Date:  
21/09/2021