

Stakeholder Reference:
Document Reference:

Part A

Making representation as CPRE Essex

Personal Details		Agent's Details (if applicable)	
Title	Mrs		
First Name	Patricia		
Last Name	Moxey		
Job Title (where relevant)	Vice Chairman		
Organisation (where relevant)	CPRE Essex		
Address			
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Part B

REPRESENTATION

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

MM no: 33

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? 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.

Climate Emergency:

Since the Local Plan was prepared, EFDC has declared a "Climate Emergency". Reducing the number of vehicle movements and long supply chains together with a more sustainable life style is imperative if mitigation measures are to be effective to reduce rising air temperatures. Insufficient and workable policies missing from Local Plan to help meet Zero Carbon targets by 2030 in line with ECC recommendations.

Exceptional Circumstances for developing on Green Belt:

There are no justifiable exceptional circumstances for removing the WAL.E8 site from Green Belt. there are too many mixed messages about importance of protecting the Green Belt - some are in favour, others happy to disregard this. Green belt should be protected as it helps mitigate the impact of climate change and in its present state, this site absorbs carbon.

If it has to be developed EFDC have not indicated any biodiversity off-setting requirements.

The location of the site does not promote sustainable patterns of development due to the non-availability of public transport links and has failed to examine alternative employment sites within the district.

The WAL.E8 site is approximately 750m from the SAC. The vehicle movements in and out of the WAL.E8 site will be routed via junction 26 of the M25 which is 400m from the SAC and the eastbound section of the M25 passes through some of the SAC. Clearly the additional traffic from the HGV depot will have an adverse impact on the SAC. especially as the prevailing wind is from the west.

The development will cause a substantial increase in traffic (particularly HGVs) to an already congested road network. Electric vehicles are not an ideal solution as unsustainable - lithium is a rare metal and will be in short supply! The nearby Sainsbury's HGV depot is about to be expanded to

accommodate a high number of additional vehicles and this increase is not currently included in the Local Plan.

there are real concerns about the levels of air quality at busy traffic areas in and around Waltham Abbey such

as Honey Lane, Tesco and the Woodbine and the road to Waltham Cross. Development of the WAL.E8 site for HGV use would lead to a significant adverse impact on air quality. All vehicles produce PM2.5 from tyres and brakes and fossil fuels. WHO 2021 is damning in its findings about impact of poor air quality on human health. Poor air quality also impacts on the SAC.

The WAL.E8 site has been the subject of a planning application from Trinity Hall / Next plc for a huge

HGV depot. Although currently refused by EFDC council, it number of jobs to be created by Next for the 10ha site is 392 with the WAL.E8 site representing over 50% of the employment land allocation yet is planned to deliver only 4% of the job growth, predominantly in the low wage bracket so local residents will be at a disadvantage as they are unlikely to be able to afford to rent or buy accommodation.

The EFDC review of the WAL.E8 site wrongly claims that it is in Flood Zone 1 (least likely to flood). However, the planning application for WAL.E8 confirms that the site includes Dowding Way itself for access purposes and drainage outfall to Black Ditch – both of which are Flood Zone 3 (most likely to flood) and recent flooding has been a serious issue on other local roads during periods of Heavy rainfall.

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.

The proposal to remove the WAL.E8 site from Green Belt designation is unlawful and should be removed from the Local Plan.

Signature: Patricia Moxey Date:
23/09/2021