

19th September 2021

MM Consultation 2021
Planning Policy
Epping Forest District Council
Civic Offices
323, High Street
Epping
CM16 4BZ

Dear Sirs,

Response to Consultation on Main Modification to EFDC Local Plan – South Epping Master Plan (SEMPA)

Further to previous representations that we have made in respect of the proposed promotion of the SEMPA, within the Epping Forest Local Plan Submission prepared by EFDC, we write further having now had the benefit of attending a presentation by David Lock Associates (DLA) on 6th September 2021.

We understand that DLA represent the Fairfield partnership and therefore have a good understanding of the proposals and detail behind the submission.

We understand that the initial proposal of 950 units and associated infrastructure across two land parcels, EPP.R1 and EPP.R2 has been reduced to 450 units following the review by the Planning Inspectorate. We also understand that exact split of the units across the land parcels is as yet undetermined.

We understand that in summary the main concerns raised by the Inspector during the first review were:-

- Site constraints, including Green Belt and HRA considerations, noise and air quality associated with the M25, the presence of overhead powerlines and the need for a bridge over the railway to connect them.
- With particular reference to site EPP.R2, the effect of development on the elevated land in the region of Flux's Lane upon the Green Belt (purpose 4), together with the potential effects of any necessary acoustic bund adjacent to the motorway.
- Whether it is viable for the development itself to fund the vehicular bridge across the railway which the Council and highway authority maintain is essential for connectivity, and the impact on delivery of the strategic site.

We further understand that the Inspector recommended that the Council should review its site capacity work, preferably in conjunction with the site promoters, with the above concerns in mind

together with the need for SANG provision and that the review should set out clearly how the bridge is intended to be delivered and what contingencies will be in place if this does not happen. A reduction in the number of dwellings proposed and/or a delay in the projected timing of their delivery was anticipated.

It was clear from the meeting that we attended that the further modifications that have been prepared in response to these concerns are far from satisfactory and question the soundness and viability of the site.

The main concern is that there is no credible transport statement to support the SEMPA and the proposed capacity increase in this, already constrained area, a point confirmed by DLA during the presentation.

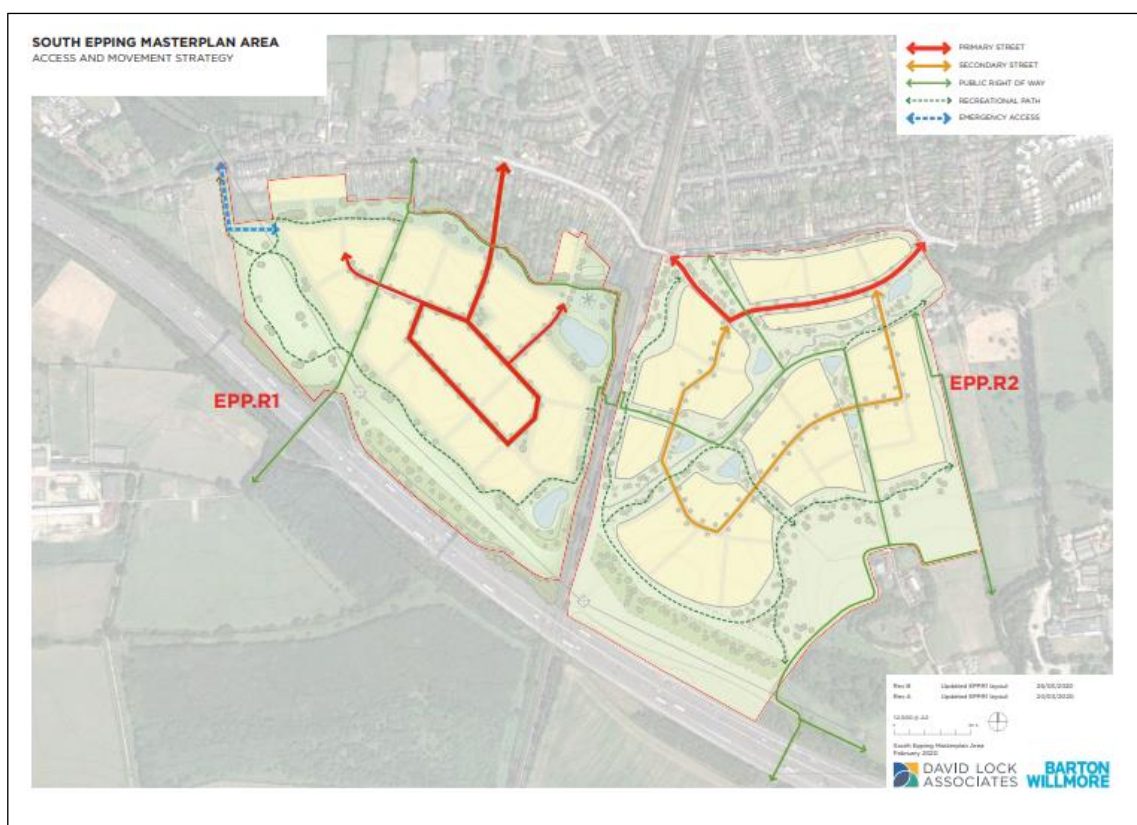
In fact it is clear that transport and access does not appear to have been considered at all. As noted above the inspector raised a concern that the 'essential' road bridge over the railway is a key consideration. The response appears to have been to remove the vehicle bridge and inclusion of the following statement within the Capacity Analysis:-

'There are no strategic transportation benefits in seeking to link EPP.R1 and EPP.R2 with a vehicular road bridge. A vehicular road bridge in this location would have the effect of attracting extra traffic to the south of Epping creating problems in the wider strategic flow of traffic distribution. A vehicular bridge through the site has the potential of creating a 'rat run' through the site.'

I am not sure what this statement is actually saying as the only additional traffic that will be attracted to the area would be vehicles related to the new development.

Ivy Chimneys Road is already a 'rat run' at peak times to avoid the main road.

It would appear that the point of the bridge has been missed entirely. It is required to make the masterplan work, but its inclusion makes the masterplan un viable due to the significant cost of the bridge.



THE Capacity plan that has been published, which we assume is in support of the revised statement on removing the railway bridge has serious concerns relating to traffic. DLA confirmed that access and egress from the two land parcels had not been considered in detail during the preparation of the capacity analysis, and the routing shown in the access and movement strategy, shown above, has no technical back up, a fact I find astounding! How can capacity of a land parcel be considered if there is no viable traffic strategy. To say that transport will be considered at a later stage in the process seems to be too late and means that the viability of the site is just 'kicked down the road' .

The main concerns with access and movement strategy are:-

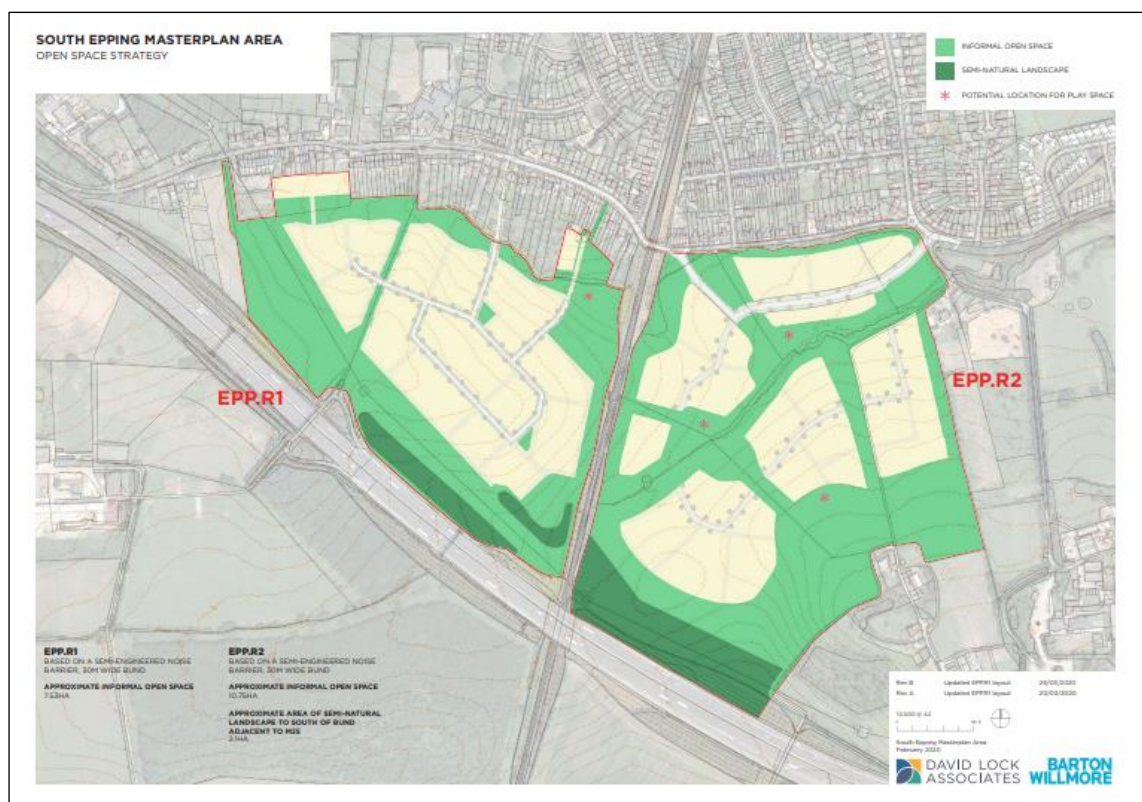
EPR.R1 has one point of primary access and egress which is entirely reliant on a number of existing properties of Ivy Chimneys Road being demolished. I note these properties were not in the original plan to include these parcels in the plan. This would create a further congestion point in an area of Ivy Chimneys Road, which is already a nightmare due to the location of the primary school, narrow roads and parking. It is not clear how traffic will then move away from this area, Ivy Chimneys Road and the Bell Common junctions are already at capacity, to send traffic up Centre Drive would then add capacity issues to other junctions in the area.

EPR.R2 – the suggestion that there could be an access/egress point adjacent to the existing rail bridge in Bridge Road is beyond belief!

During the presentation DLA confirmed that a transport plan is required to make the proposal 'sound'. It is clear that there is no robust transport plan to service this proposal and therefore that fact alone brings in to question the soundness of the SEMPA.

The presentation also highlighted a number of other critical challenges that the SEMPA will have to overcome in order to have any chance of succeeding to provide housing.

The modifications are required to demonstrate that the site includes "Suitable Alternative Natural Greenspace" (i.e. open space) so residents have somewhere apart from Epping Forest for dog walking and other activities.



The above Open Space Strategy has been published, but there are questions over how effective the greenspace identified will be in diverting people away from Epping Forest as the proposed green space is right next to a motorway and Epping Forest is a short walk away on public footpaths. It is without doubt that the occupiers of any new development will choose the Forest or Bell Common over a small area of green space next to the M25.

The Modifications also require the development to make financial contributions to the Epping Forest Air Pollution Mitigation Strategy (which includes a proposal to introduce road charging on forest roads if pollution levels don't improve). There are big questions over whether the level of development proposed by the council is compatible with protecting the forest (and residents) from the effects of air pollution and if the proposals in the air pollution strategy are actually deliverable.

On top of all of the above points there is also significant concern that the basic infrastructure provisions relating to school and healthcare provisions are not clear both in terms of if and how they will be provided and how the provision of such resources will impact on the overall viability of delivery of the development.

As I have said in previous representations, the intention of the Local plan is to deliver much needed housing, from what I can see the inclusion of the SEMPA in the local plan will not do this within the life of the plan, and in any event it will be poor quality housing in terms of noise and air quality which add to the concerns on viability.

It is clear that the SEMPA has been poorly promoted by the Council, for reasons unknown, when there are other areas that have lesser constraints that could deliver housing more effectively. Our understanding is that removal of the SEMPA from the plan would not affect the ability of EFDC to meet the housing numbers required by the Government. To proceed with the inclusion of this ill-conceived plan that would also require changes to existing greenbelt, when it is potentially un sound seems to be irresponsible of the Council.

Yours faithfully

David & Lorraine Rogers