

## **Representation form for Submission Version of the Epping Forest District Local Plan 2011-2033 (Regulation 19 publication)**

This form should be used to make representations on the Submission Version of the Epping Forest District Local Plan which has been published. Please complete and return by 29 January 2018 at 5pm. An electronic version of the form is available at <http://www.efdclocalplan.org/>

**Please refer to the guidance notes available before completing this form.**

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**Please return any representations to:** Planning Policy, Epping Forest District Council, Civic Offices, 323 High Street, Epping, Essex, CM16 4BZ

Or email them to: [LDFconsult@eppingforestdc.gov.uk](mailto:LDFconsult@eppingforestdc.gov.uk)

**BY 5pm on 29 January 2018**

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This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

***Please attach any documents you wish to submit with your representation***

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### **Part A**

1. Are you making this representation as? (Please tick as appropriate)

a) Resident or Member of the General Public ☒ or

b) Statutory Consultee, Local Authority or Town and Parish Council ☐ or

c) Landowner ☐ or

d) Agent ☐

Other organisation (please specify)


## 2. Personal Details

## 3. Agent's Details (if applicable)

Title	<input type="text" value="MR."/>	<input type="text"/>
First Name	<input type="text" value="JONATHAN"/>	<input type="text"/>
Last Name	<input type="text" value="NUTTON"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text" value=".....Redacted....."/>	<input type="text"/>
Line 2	<input type="text" value=".....Redacted....."/>	<input type="text"/>
Line 3	<input type="text" value=".....Redacted....."/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value=".....Redacted....."/>	<input type="text"/>
Telephone Number	<input type="text" value=".....Redacted....."/>	<input type="text"/>
E-mail Address	<input type="text" value=".....Redacted....."/>	<input type="text"/>

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Mr Jonathan Nutton

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27<sup>th</sup> January 2018

**Following the Council meeting on 14 December 2017, although Epping Forest District Council (EFDC) has voted through the Local Plan, the South Epping masterplan does not meet the test of the plan as being justified, and is therefore unsound. EFDC should be following an evidence-based approach and they have utterly failed to demonstrate this.**

**Not least, Councillors in the chamber at the December 14th meeting were given an ultimatum by Cllr John Philip (Portfolio Holder for Planning Policy Epping Forest District Council) that the only option available to them was to vote thru the 'submission' version of the Local Plan or face the "threat" that an additional 8,000 homes would be forced on the District by central Government. Therefore it is not sound and cannot be justified. Therefore it should be thrown out.**

**The South Epping Masterplan fails crucial tests of soundness.**

**1. Site Constraint.** Noise and air pollution would need to be mitigated as the proposed site is next to the busiest road in the country. To mitigate pollution, huge barriers would need to be built next to the raised section of a motorway to protect future residents. The site contains high voltage cables/pylons. The site contains oil pipelines. The site has Tree Preservation Orders (TPOs). The area has ancient woodland. The site contains BAP habitat (defined as "an area under threat requiring conservation action"). The topography is hilly and would provide a challenge to build on. Soil is predominantly clay and very boggy. Surface water is often seen. The land opposite Brook Road is at the bottom of a hill and floods regularly.

**2. Sustainability of location.** The proposed development would be far from the tube station as is possible, Epping High Street and St John's Senior School. The result will be a huge increase in local traffic as it would be impractical to walk or cycle uphill to Epping from this distant location. There is no indication of affordable housing provision levels. These would be compromised by the high cost of the development.

**3. Infrastructure Requirements.** Requirement of a relief road over/under the Central Line at a cost estimated of between £8 to £10million, money that could be saved and spent on infrastructure at an alternative site. Working with TFL would be an extreme challenge while this big civil engineering project is being undertaken. New road provision implies two additional junctions would be required, which would lead to bottlenecks at the top of Ivy Chimneys Road and Stewards Green Road. These junctions have not been costed.

**4. Removal of Green Belt.** The removal of Green Belt to the south of Epping has been assessed as "High Risk". Other potential sites exist that are Low or Medium Risk to Green



Belt. This is prime Green Belt that acts as a buffer between Epping and the toxic M25. The land is BMV agricultural grade and should not be touched.

**5. Land Assembly.** There are six separate landowners of land in south Epping which means that the land has not been promoted as a single cohesive development. No plans exist for the South Epping Masterplan.

**6. Access and Highways.** Brook Road and Ivy Chimneys Road are single track in places and cannot take any increase in traffic. There are two Primary Schools locally and an increase in traffic would lead to safety concerns for pupils. It would be impossible for construction traffic to use existing roads. There is no obvious access to the western parcel. Very restricted access to the eastern parcel via Flux's Lane, which is single-track road that is the only access to Coopersale Hall School.

**7. Development Benefits.** Alternative sites already include key infrastructure embedded in their proposals (Primary School, GP Surgery, Leisure and Retail facilities etc). There are no such guarantees for south Epping in the Local Plan. No plans exist.

#### **So what reasonable alternatives exist?**

There are two obvious, large sites that exist and are available for development. **They are more appropriate, sustainable, and economically viable.** However, they are not in the Local Plan. These are namely land East of the Orchards (the East Epping Masterplan) and North Weald Golf Course. Developers already have detailed plans for these two sites. Other sites may also be available. Theydon Bois has been allocated just 58 houses in the Local Plan and could easily take 500-1000 houses to the east. All within walking distance of the tube station, which already has independent access to both east and west platforms.

#### **In conclusion;**

**The south Epping masterplan does not meet the test of the plan as being justified, and is therefore unsound.** EFDC should be following an evidence-based approach and they have failed to demonstrate this.

Therefore, the Local Plan should be rejected, or major amendments made.

Development should be removed entirely from south Epping and re-allocated to viable sites.

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Mr J Nutton