

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	Valerie, Mr Harold, Mr Martin	
Last Name	Russell	
Job Title (where relevant)		
Organisation (where relevant)		
Address		
Post Code		
Telephone Number		
E-mail Address		

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## Part B

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### REPRESENTATION

**To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?**

Paragraph:

Policy: P 1 Epping

Policies Map:

Site Reference: EPP.R2

Settlement: Epping

**Do you consider this part of the Pre Submission Local Plan to be:**

Legally compliant: Don't Know

Sound: No

If no, then which of the soundness test(s) does it fail? Justified

Complies with the duty to co-operate? Don't Know

**Please give details either of why you consider the Submission Version of the Local Plan is not legally compliant, is unsound or fails to comply with the duty to co-operate; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible. Please use this box to set out your comments.**

“The Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence; “

This is not the case for the newly re-designated site references EPP.R1 and EPP.R2, previously referred to as SR-0069, SR-0069/33, SR-0113A, SR-0113B together with neighbouring SR-0333Bii, SR-0445, SR-333Bi and this re-designating at this late stage could be viewed as an attempt at deliberate obfuscation. The sites (EPP.R1 and EPP.R2) are not the most appropriate sites, when considered against the reasonable alternatives, based on proportionate evidence in the reports provided by the council.

Sites EPP.R1 and EPP.R2 are inappropriate Green Belt sites because of constrained access, power lines, the BPA Oil pipeline, distance from the town centre and railway station, Motorway air and noise pollution, traffic issues raised in response to the draft local plan and the sheer amount of infrastructure required to overcome these issues and constraints together with cost thereof.

Access is constrained by the M25 Motorway to one side, the Central Line Railway on another and busy local roads with parking issues that are used as rat-runs and school-runs on another side. The report on site selection (Extract for Epping p67-111) states “Power lines may constrain part of the site” and “Approximately 6% of the site is affected by the BPA Oil pipeline “. It also states “Suitable access to site already exists. Access from main roads.” this last statement appears unlikely to be true, as judging by response to the draft local plan (see Draft Local Plan Consultation Report pages 75 to 78) where 93%, i.e. 393 responders disagreed with the sites proposed, when half the number of homes were proposed on these sites.

No information is provided about why these sites have been chosen by the council over other more suitable sites around Epping and the Council is yet to publish all of the detailed appendices which accompany the Site Selection Report and provide details relating to the assessment of individual sites.

Very little information is provided about the proposed South Epping Masterplan Area and the cost of the infrastructure required (See Pages 117-118 of Local Plan Submission Version Section K) “In addition to the requirements set out above, the Strategic Masterplan should make provision for” items i-xvi specifically item x that states “incorporation of an appropriate buffer to protect the amenity of future residents with regards to noise and air quality from the M25 and an appropriate buffer from the High Voltage Transmission Cables and land impacted by the BPA Oil Pipeline constraints;” Some of these 16 requirements would not be needed if development was evenly spread over more suitable existing sites around Epping, closer to the Town centre and railway station with better access to both.

**Please set out what change(s) you consider necessary to make the Pre Submission Local Plan 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 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.**

Instead of large new estates on only one side of the Town, evenly spread development over more suitable sites around Epping that are closer to the Town centre and railway station, with better access to both. Other sites do exist that could have good access to existing roads, are not too far to walk from the town centre, schools and the railway station.

Sites previously referred to as SR-0071, SR-0343 and SR-0153 (situated between Kendal Avenue and Stonards Hill and Bower Hill/The Orchards and Coopersale Street) would be more appropriate because they don't have constraints of Motorways, Railways, Power Lines, Oil Pipelines, Air Pollution, Noise Pollution and access problems of the sites currently proposed.

**If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at oral examination

**If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination**

Yes

Signature:  Date: 29/01/2018