

Stakeholder Reference:
Document Reference:

Part A

Making representation as Resident or Member of the General Public

Personal Details		Agent's Details (if applicable)
Title	Mr	
First Name	Roger	
Last Name	Rose	
Job Title (where relevant)		
Organisation (where relevant)		
AddressRedacted.....	, ,
Post CodeRedacted.....	
Telephone NumberRedacted.....	
E-mail AddressRedacted.....	

Part B

REPRESENTATION

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

Paragraph: K (x)

Policy: DM 21 Local environmental impacts, pollution and land contamination

Policies Map:

Site Reference: EPP.R2

Settlement: Epping

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

Legally compliant: No

Sound: No

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

Complies with the duty to co-operate? No

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.

From plan - "The development of the allocated sites within Epping have the potential to produce air pollution that could impact upon air quality in the District, including Epping Forest. In accordance with Policy DM 2 and Policy DM 22, all proposals on sites which require a Transport Assessment/Transport Statement will be required to undertake an air quality assessment that identifies the potential impact of the development, together with contributions towards air quality monitoring"

Response - Air quality which may be expected to deteriorate with more homes and more traffic and an ever-busier motorway adjacent to the site. Air quality testing was not exhaustive and was undertaken in parts of the site that were furthest from the source of pollution (M25), not giving true picture of the whole area. The plan mentions the creation of a buffer to alleviate noise/air pollution, the site is already a buffer for these in the Brook Road area, what can effectively be done to contain an airborne threat?

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.

The site is unsuitable due to the close proximity of 1. The busiest motorway in the country. 2. High voltage overhead cables on the site. 3. BPP high pressure pipeline under the site.

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

Yes, I wish to participate at the oral part of the oral examination

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

To further explain my representation.

REPRESENTATION

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

Paragraph: K (v,vi)

Policy: D 1 Delivery of Infrastructure

Policies Map: Yes

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? Positively prepared,Effective,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.

From plan - (v) new road access and internal road layout to support a bus corridor;
(vi) a new vehicular, pedestrian and cycling bridge over the railway line;

Response -

Regardless of any new road access/ layout, bus corridor, new bridge over railway there will inevitably be extra pressure on Brook Rd/Ivy Chimneys Rd which is already at saturation point for much of the day. Brook Road / Bridge Hill cannot be widened due to the existing railway bridge so the bottleneck will still remain and only worsen. Any access roads on to the new site would create even more pinch points. Traffic surveys were carried out at inappropriate times including school holidays, the most recent was only in place for a short period outside of the rush hour, this would give a wholly inaccurate picture of the current volume of traffic in school term time and for much of the day.
The cost of the new bridge over the railway is ridiculously expensive (10 million plus).

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.

The new road and bridge (if built) should be made wide enough to become the only through road in the area, Brook Road should be closed at the current railway bridge which would relieve traffic congestion in the area.

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

Yes, I wish to participate at the oral part of the oral examination

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

To further explain why the plan is not sound.

REPRESENTATION

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

Paragraph: K (i)

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: No

Sound: No

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

Complies with the duty to co-operate? No

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.

From Plan - In addition to the requirements set out above, the Strategic Masterplan should make provision for:
(i) a minimum of 950 homes;

Response - During the public consultation in 2016 the plan proposed around 200 dwellings on SR-0113B, now the submission version indicates that there will now be c 500 dwellings. This has been done with no further consultationRedacted..... without a care for the suitability of the site with regard to infrastructure or the impact on the green belt and natural beauty of the area. 950 homes in the South Epping Plan amounts to a very large percentage of the current building requirement for Epping, all within an already congested part of the area.

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.

Other sites that were originally proposed (East Epping Plan, North Weald Golf Course) have been ignored even though very strong proposals were submitted for both. These should be further investigated by the inspector for suitability.

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

Yes, I wish to participate at the oral part of the oral examination

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

I could further articulate my reasons for making this representation.

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

Yes

Signature: Roger Rose Date: 28/01/2018