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Local Plan Regulation 19 Representation
Planning Policy Team
Epping Forest District Council
Civic Offices
323 High Street
Epping
Essex CM16 4BZ

28th January 2018

Dear Sirs

Ref Epping Forest Local Plan – Final Submission Representation

Please find within this correspondence our response to a request for representations on the proposed submission version of the Epping Forest District Council Local Plan.

These representations are primarily restricted to the area proposed for the South Epping Masterplan and the wider Epping area, but will also focus on the area of Ivy Chimneys

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Attached is a copy of the comments that we submitted when the Draft Local Plan was published.

On the face of it, it appears very little of this document has been considered in the preparation of the Final Submission document, with the overall allocation to the south of Epping increasing and now being given a Masterplan of its own! This is very disappointing.

We recognise that there is a requirement for additional housing to be supplied nationally, and that this will present challenges to the controlled growth around existing settlements,

however a well prepared and considered Local Plan should allow for viable and sustainable development. The aim is to provide more houses now, the South Epping Masterplan does not do this. The Local Plan does not contain any detail of how the Strategic Masterplan will be delivered but it is clear that it will become bogged down in the complexity of the numerous constraints that the area has, and the significant list of provisions noted on page 117 of the Submission plan.

Returning to the original requirements of the Local Plan process, a key step in the preparation of the Local Plan is to carry out an assessment of land availability. The guidelines for this process are clearly laid out by Central Government.

In order to select sites for inclusion in the plan it has to be **SUITABLE, AVAILABLE** and **ACHIEVABLE** (including viable) for housing and economic development uses over the plan period.

The proposed sites for the South Epping Masterplan area is none of these.

Sites are considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. The timescales required to provide the supporting infrastructure alone make the South Epping Masterplan unlikely to be developed until very late in the period covered by this Local Plan process, if at all.

It is incredulous that for such an important process to have concluded and located 73% of the Epping allocation in this area, with the significant constraints posed by changes to the Green Belt, land ownership, environmental and infrastructure issues that are required to be overcome to make the plan available. The Plan has very vague detail noted within the submission documentation and where there is evidence, this remains, in my opinion, based on very high level desk top studies.

The effect of these constraints and masterplan provisions will weigh significantly against the viability of the scheme, where financial support for infrastructure for the required delivery of the Masterplan will be derived directly from the CIL and s106 payments.

This coupled with an expectation of 40% of property to be considered as affordable, make this a very challenging development for developers to consider investing in.Redacted.....

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It therefore appears that this masterplan, upon which the Epping allocation is based, should have been dismissed at an earlier stage in the assessment and other more appropriate sites considered. Examples are the northern side of Epping, where infrastructure will be easier. There is also the North Weald Airfield Masterplan, of which, again there is little detail.

It is worthy to note that decisions have been made between the draft and the final submission documents to significantly amend allocations. Taking Theydon Bois for example. The draft plan had an allocation of 360 units for Theydon Bois, which has been reduced to 57 in the final submission document. For the draft plan to have included the original allocation, the previously noted site availability tests must have been carried out. It is therefore not clear how the reduction of 303 units would have been arrived at and where such a decision significantly varies when compared to assessing the constraints that will be faced by the South Epping Masterplan.

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Returning to the overall Epping proposal, are the Council seriously proposing to remove every significant car park, including the station car park along with other essential local services? whilst proposing an additional 1,305 housing allocation. There will be nowhere for visitors to Epping to park.

What is the economic sense towards the local economy in the elimination of significant areas of central town parking. The plan is also apparently based upon the fact that the new residents of the South Epping Masterplan will always walk or cycle everywhere.

When it comes to the Tube station car park, this is full everyday by 07:00pm, that is not Epping residents, this is people from the surrounding area. Where is this parking going to go?

I could go on....

Turning now to the specific area of Ivy Chimneys.

The final submission document has now seemingly extended the area of land being considered westwards in Ivy Chimneys from that shown in the Draft Plan.

The Final Submission Plan has this area of land contained in the reference EPP.R1.

The Draft Plan had the following references for this area:-

SR-0333Bii

SR-0445

SR-0333Bi

SR-0069/33

SR-0069

Primarily this is Green Belt Land, the Councils own assessment has this land as *'Site is within Green Belt, where the level of harm caused by release of the land for development would be high or very high'*. How is this land any less important than other land around Epping or Theydon Bois with the same designation? It is not clear from the documentation, that I have read, where any 'Exceptional Circumstance' required to build on this land is demonstrated.

Housing need alone is not an exceptional circumstance!

As noted in our attached comments, this is low quality land from an environmental point of view. With the adjacent M25, noise and air quality will add significant challenges to housing design, and the HV overhead cables will make large areas of the proposed land unavailable to build on. This raises the question would the Masterplan ever be delivered in this area.

It is interesting to note that this view was supported in the documents contained in the Draft Plan where the following statement was made parcel of land noted as SR-0333Bii:-

'The site scores poorly in terms of air quality and it is unlikely that the impact could be mitigated. The site should not be considered further.'

It is therefore surprising that site SR-0333Bii, has now found its way back into the plan.

In the period between the publication of the Draft Plan and the Final Submission Document, nothing has changed to mitigate the original view, how come this site has returned??. The Site Suitability Assessment in Appendix A-B1.4.2 identifies that there is already access to this site from car park off Ivy Chimney Road. There is no Car Park!!!!

It is also of interest on the issue of noise mitigation to note the reference at the bottom of page B94 of document A-B1.4.1-Stage – 2 Asmt Methodology – Aru-2016-EB801F, which states *..at a Traveller site close to a major motorway mechanical ventilation there is unlikely to be an option for mitigation..*

Site SR-0333Bii is situated directly adjacent to the Bell Common ventilation plant.

It was also pointed out in our previous comments that at that end of the area, the land has no direct route to the road infrastructure with out having to pass over Corporation of London Land.

The allocation is for 13 houses, this is not **SUITABLE, AVAILABLE or ACHEVABLE!**

We previously noted that site SR-0445 has a restrictive covenant on it that restricts it to one property. How can 27 properties be proposed, the site is **NOT AVAILABLE**, and should not therefore be included in the Plan!! Access to this site is also constrained by the Corporation of London land strip.

Access to the main sites contained in EPP.R1, sites SR-0069-33 and SR-0069 is also a concern. It is noted in the Site Suitability Assessments that the access to SR-0069-33 (250 dwellings) is though access that is already in place with SR-0069 (56 Dwellings).

Does this exist? I do not think so! Our understanding is that this may be via existing access from Bridge Hill and third-party owners, which are single tracks between existing houses. This this would not on its own facilitate adequate access requirements to serve the proposed 306 dwellings and the consequential impact on Bridge Hill. We are also aware that other options are being pursued by the Council to an alternative access point, directly opposite Centre Drive, surely this means that the sites being considered are not yet available, and the whole plan is dependent on either ransom agreements to gain access or entering into Compulsory Purchase proceedings, which could be lengthy.

We have also carried out an initial review of the Infrastructure plans contained in the documentation. They were extremely vague in terms of cost and potential success within the draft documents, the final submission has not improved on this, with no definitive proposals to overcome the know traffic mitigation that will be required.

How can such a significant Masterplan be recommended in this plan, where the constraints are so great and solutions so vague without the inclusion of the Masterplan itself. How can local residents be expected to effectively respond to such a plan when there is no tangible plan to review. Why can this not be included.

The Local Plan may be heading towards the end of its journey for submission to Central Government, but it is clear, [REDACTED]Redacted.....

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have demonstrated a complete lack of understanding of the concerns of the people, although small in number, who will be affected by this Masterplan.

The implications are however much wider in the loss to Epping as a whole of its Historic Town feel both in terms of occupancy and commerce. The opportunity to provide a more suitable and viable plan has, in our opinion, been missed.

As stated at the beginning of this letter, the objective of the Local Plan process is to provide a sustainable and affordable plan that will deliver a much needed housing requirement. In particular relation to the Epping allocation, we believe that this is a plan to fail.

Our hard work now begins in lobbying the Planning Inspectorate by continuing to raise the points summarised in this letter and further detailed scrutiny of the submission documents and should the Plan be adopted, review potential legal challenge to the Plan and its preparation and comment and challenge any subsequent planning applications that are made. We are sure we are not alone in this.

As far as Epping is concerned, we are disappointed that the solution is to allocate 73% of the allocation to what is potentially the most constrained and unviable land around Epping.

Yours Sincerely

Lorraine and David Rogers

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