

Areas of main concern around EFDC Local Plan Main Modifications Consultation Via Epping Town Council Attachment 2b

Consultation Procedure

- The 'public' consultation is inaccessible to the public. The Main Modifications (MM) section of the website alone contains approximately 30 documents totaling 2,704 pages. This is in addition to dozens and dozens of further inaccessible documents housed within the broader Local Plan website. There is no summary or signposting for the public to understand and access the documents of most interest. This will significantly deter members of the community from engaging, and makes the notion of a truly public consultation a rather moot point. A document needs to be uploaded to the website which sets out the main changes to the plan in a clear and accessible format, with signposting to more detailed documents for those who wish to read further.

MM78 South Epping

- Page 106 of the MM document indicates that wording has changed from 'Development proposals in relation to sites EPP.R1 and EPP.R2 *must comply* with a Strategic Masterplan for the South Epping Masterplan Area which has been formally endorsed by the Council prior to the determination of any planning applications', to 'Development proposals in relation to sites EPP.R1 and EPP.R2 *must be in general conformity* with a Strategic Masterplan for the South Epping Masterplan Area which has been formally endorsed by the Council prior to the determination of any planning applications'. Who will decide what or who is considered to be 'in general conformity', and does this mean that developers can essentially disregard the planner's comments? This is not clear.
- Page 107 of the MM document states that the South Epping Masterplan Area must make provision for appropriate community and health facilities, employment and retail uses. The wording here is vague and it is difficult to understand what will (or, more importantly, what *will not*) be included here. Without further details, it is difficult to consult with the public on these vital services. I am particularly concerned about the provision of 'health facilities'. Again, this is vague and seems to suggest that this will not translate into a much-needed GP surgery.
- Page 107 of the MM document states that the South Epping Masterplan Area must make provision for a new primary school. It is not clear here whether this will be in addition to, or a replacement for, the existing Ivy Chimneys Primary School.
- The additional traffic that will be created by the South Epping Masterplan Area – and the lack of detail around this in the MM document – is of particular concern. Brook Road and Ivy Chimneys Road (those bordering the South Epping Masterplan) are one of only two entry/exit roads in to and out of Epping. Drivers use the road to avoid the busy high road area. Many parts of the road are single track, compounded by parked cars (few houses have off-street parking). The Central Line bridge running

across the two roads is on a narrow bend and creates a dangerous bottleneck with existing traffic flow. Ivy Chimneys Primary School is positioned at one end of the road and Coopersale Hall Primary School at the other. There is particularly heavy traffic at drop off/pick up times. Construction traffic couldn't use the existing road network to access the South Epping Masterplan Area site. Additional roads and access points would need to be in place before construction started.

- The lack of visual image/map of the proposed layout of the South Epping Masterplan Area makes it difficult to visualize, consider, and consult on the proposed site. A rough layout is included in an earlier document created by the site developers; however, this was based on the original housing allocation so is essentially obsolete.
- Given the considerable restrictions and constraints of the South Epping Masterplan Area, it remains unclear why the site has been deemed most appropriate for the largest portion of development in the local area. Of the 31 sites initially put forward for consideration in Epping (details of which were only released a significant time after the formal consultation period on the Epping Forest District Local Plan Submission Version 2017 ended, and following a successful legal challenge by CK Properties Theydon Bois Limited), 15 were not proposed for allocation. According to the site allocation report, of these 15 non-proposed sites, 12 identified no on-site restrictions or constraints to development. The justification given for not proposing these sites included: complex ownership patterns; landscape sensitivity; Green Belt harm; the presence of BAP Habitats and Tree Preservation Orders which would result in reduced site capacity; and that the sites were '*less preferred by the community*'.

Conversely, the site selection report identified on-site restrictions and constraints in each of the large-scale sites proposed for development in the South Epping Masterplan area. Furthermore, the justifications outlined above for not proposing other sites for allocation are very much present in the areas South of Epping proposed for allocation: the land is Green Belt, is affected by BAP Habitats and Tree Preservation Orders, is split across six different owners, cannot be promoted as a single cohesive development, and offers no guarantee of streamlined delivery for development purposes. As such, there remains no compelling evidence base to support the proposal of the South Epping Masterplan Area site.

Resident. ~~M-P~~