

Name:

**Part B – Your representation on the further Main Modifications and/or supporting documents**

If you wish to make more than one representation, please complete a separate [Part B form](#) for each representation and clearly print your name at the top of this form.

4. Which further Main Modification and/or supporting document does your representation relate to? (Representations are only invited on further Main Modifications within the Schedule. These are denoted by red text. The reference number can be found in the first column in red i.e. **MM2**, **MM11** and each Supporting Document has a reference number beginning with ED).

Any representation on a supporting document should clearly state (in question 6) which paragraphs of the document it relates to and, as far as possible, your comments should be linked to specific further Main

MM no.

Supporting document reference

5. Do you consider this further Main Modification and/or supporting document:  
(Please refer to the Guidance notes for an explanation of terms)

- a) Is Legally compliant      Yes       No
- b) Sound      Yes       No

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

Positively prepared       Effective

Justified       Consistent with national policy

6. Please give details of why you consider the further Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise and concise as possible. If your response exceeds 300 words please also provide an executive summary of no more than 300 words. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.

MM78 seeks to amend the housing number for the SEMPA area from “approximately 450” to “a minimum of 450”. The current wording allows for more than adequate flexibility.

Previous representations and the evidence base, in particular ED-144 (Council’s response to Actions outlined in Inspector’s Note 16 June 2022) pages 20-27 set out a large number of constraints pertaining to the SEMPA area and makes clear that increasing the number of homes beyond 450:

- is likely to damage the landscape given the landscape sensitivity of the area,

*(Continue on a separate sheet if necessary)*

- would leave insufficient land for the education, health, recreational and community facilities required to support the new development,
- would leave insufficient land for alternative natural greenspace (SANG)
- would place additional pressure on the local transport and other infrastructure. that would not be viable to mitigate. In particular the lack of a vehicular crossing, previously identified as a requirement when 950 dwellings were proposed, becomes increasingly significant as the number of dwellings increases and as the vehicle traffic is forced to use the narrow and already congested residential roads along Ivy Chimneys – Bridge Hill – Brook Road to access the wider road network.

Indeed we consider this among the factors that makes the site unsuitable even at 450 dwelling given the evidence base does not include anything that demonstrates how the traffic effects on local roads and the wider network, including the over-capacity junctions along Epping High Street, will be mitigated.

We are also concerned that an increase in number of dwellings would leave insufficient land to protect and enhance the existing streams, watercourses, hedgerows and trees in the SEMPA area which are important for biodiversity and amenity and which would be contrary to the council's adopted blue and green infrastructure strategy.

Finally the use of "a minimum of" is inconsistent with other site allocations in the plan which overwhelming use "approximately" e.g. policy P1 B.

7. Please set out what change(s) you consider necessary to make the **further Main Modification and/or supporting document** 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 Submission Version of 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 and concise as possible. If your response exceeds 300 words please also provide an executive summary of no more than 300 words.

Deleting the site from the proposed allocations would meet our concerns

Alternatively retain the “approximately” instead of amending to “a minimum of” and / or reduce the number of dwellings below 450.

*(Continue on a separate sheet if necessary)*

8. Have you attached any documents with this representation which specifically relate to a further MM or supporting document?

☐

Yes

☒

No

Signature:



Date

9.12.22