

## **REPRESENTATION FOR SUBMISSION VERSION OF THE EFDC LOCAL PLAN (2011-2033) TO INSPECTORATE**

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**The plan for South Epping (SR-00113B & SR-0069-33) is not positively prepared, justified, effective or consistent with The National Planning Policy Framework. The NPP requires that for a plan to be justified, it should ‘be the most appropriate strategy, considered against the reasonable alternatives, based on proportionate evidence’. The proposals for the South Epping Masterplan are not sound as they are not justified. The deliverability, especially of infrastructure requirements over the period, is also questionable, given the constraints and sustainability issues with South Epping: compared to East Epping and North Weald Golf Course. Evidence based points include soundness / legality / sustainability of location / effectiveness / infrastructure and delivery requirements.**

### **Soundness**

**The above plan is not ‘.... the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence ....’ (The NPPF) therefore the plan is not sound as it is not justified.**

The allocation of the majority of housing (minimum 950 homes to South Epping) is not the most appropriate strategy when other sites’ including site East Epping (SR-0153) 305 houses and North Weald golf course 750+ houses, are each a feasible alternative.

- Both of East Epping and North Weald Golf Course sites have fully costed plans by developers in place; South Epping does not.
- Both sites have been put forward to EFDC. East Epping withdrawn from Version Submission Local Plan. North Weald ignored. No justification given.
- Both have single or dual land ownership (the South Epping site has six landowners).
- Both have single developers with embedded infrastructure delivery in place and do not need the necessary costly infrastructure requirements that South Epping does.
- Deliverability of affordable housing (40%) in South Epping due to high infrastructure costs. East Epping and North Weald have planned assurances that they can deliver affordable housing.
- In addition, a proposal has been put forward to EFDC that East Epping could also sustain a new neighbourhood based on the Garden City principle; replacing the allocation of 950 homes in South Epping, as well as the plan for North Weald Golf Course.
- Theydon Bois site (300+ homes) withdrawn from Submission Version Plan.
- Large, more viable site at Thornwood available for housing.
- The public have not been given access to Site selection report appendices. EFDC state that ‘The

information currently available concerning the sites allocated in the Local Plan Submission Version is sufficient to allow any disappointed party promoting non-allocated sites to make representations as to the comparative merits of allocating the promoted site. However, for the avoidance of doubt, the Council will bring the publication of the remaining appendices to the attention of the Planning Inspector appointed to examine the Plan to ensure that the issue can be considered appropriately through the Independent Examination process.'

- EFDC expressed concerns for the development in South Epping (2012/16) in conjunction with other agencies / service providers, for example Thames Water. The site has not altered in its structure / land use in the intervening years so therefore the development, and the doubling in size of, cannot be justified.

Therefore the South Epping plan is not sound as it is not justified so it cannot be considered the most appropriate strategy.

**(See attached sheet 1)**

### **Sustainability**

#### **Increased Allocation**

The increased allocation/proportion of housing in South Epping does not meet the tests of soundness required through Examination in Public (EIP).

- Site (SR-0153) East Epping – North of Stewards Green Road) was originally selected as the largest draft allocation (305 homes) in autumn 2016.
- SR-0113B (land to the South of Brook Road) – had approximately 244 homes allocated.
- SR-0069/33 (land South of Epping) – had approximately 255 homes allocated. This is a total of 499 homes.
- SR - 0153 was then selected as one of 7 Strategic locations (May 2017) endorsed by the EFDC cabinet meeting 15/06/17 either as a pair of linked sites (South Epping & SR-0153) or a single Masterplan incorporating SR-0153.

After the public consultations the Submission Version Local Plan published 05/12/17 ahead of the Council meeting held on 14/12/17 the site SR-0153 was removed from the draft allocations and the Strategic Masterplan allocated a minimum 950 homes in South Epping (an increase of 451 homes). This was done after the public consultations and therefore no more public evidence, consultations or responses were admissible. Despite being other viable options EFDC did not include East Epping and North Weald Golf Course in the Local Plan; instead they increased the allocation of 451 homes to South Epping. This is not consistent with appropriate strategy given these alternatives.

The local children's play area in Flux Lane, South Epping (not part of any plan at any stage), was given to the people of Ivy Chimneys and South Epping in perpetuity, with the condition it was not to be built on, it was then included in the Submission Plan. This has not been subject to sustainability requirements.

### **Green Belt**

The Green Belt was meant to prevent the City of London from swallowing up yet more countryside.

On 20/12/17 Theresa May said in the House of Commons that "...Councils can only alter Green Belt boundaries in exceptional circumstances..."

Sadiq Khan has also pledged to protect the green belt – ‘the lungs of the capital’.

The NPPF requires that exceptional circumstances are demonstrated to justify any alteration to the Green Belt boundary, whether this is to remove or create areas of Green Belt. As the development of South Epping is not an exceptional circumstance it is clear that the justification is not responsive to local conditions and does not take into account a range of factors.

The proposed building on the Green Belt in South Epping will remove Green Belt and alter its boundary and is not consistent with Government policy.

73% of the proposed building in Epping is on the Green Belt. 100% of the South Epping site is Green Belt.

No evidence has been presented to justify the use of the South Epping site due to ‘exceptional circumstance’. Given the viability of alternate sites (East Epping/ North Weald Golf Club/ Epping Primary School) which are more viable, and not in the Green Belt, the proposal for the South Epping site cannot be justified on this basis.

The land within the South Epping site is BMV agricultural grade

The development of the South Epping site will result in a severe loss of wildlife habitats. For example small mammals and birds of prey, including Red Kites which have been seen on South Epping site. There will also be a loss to walkers and ramblers (due to various footpaths being located on the South Epping site) as well as other leisure pursuits, should this area of Green Belt be destroyed. The South Epping site is close to Ancient Woodland and there are 20 trees with T.P.O’s on edge of South Epping site.

The development of South Epping, along the M25 corridor, close to M11 intersection, is another encroachment into the Green Belt and green spaces between settlements: which will eventually create a mass development along one of the busiest road in the United Kingdom.

Development of alternative sites would have a considerably reduced impact on the Green Belt when compared to the South Epping site and therefore the plan is unjustified and unsound.

### **Sustainability of Location**

The focus of building on the South Epping site is not the most appropriate strategy based on evidence, set out below, given the alternative sites available – for example East Epping / North Weald. The plan is not consistent as the justification for this strategy in Epping in that the Local Plan focuses development in close proximity to Epping Underground Station. The land requirements for the South Epping site (only parts of which were consulted on) is furthest away from the station.

EFDC, within the plan, has a vision for less car usage, with reliance on people walking and cycling, and states a change in peoples transport habits. This is unjustified and therefore unsound for the following reasons.

The South Epping site is at minimum:

- 1.2 miles (at least) away from the shops, the church, the library and the sports centre, in the town centre - the latter two being pulled down for housing and relocated
- 1.8 miles away from St. Johns Secondary School
- 1.95 miles away from the Limes Surgery and hospital

- 0.7 miles from Epping Station, the bus hub and the Central Line

This is up a very steep hill (3% incline) from the South Epping site (too far for most people to walk or cycle) and would necessitate the use of cars for the majority of the home owners; particularly those with young families and more elderly residents.

The development of 950 houses in South Epping would increase the level of road traffic and congestion considerably. The evidence base confirms that both East Epping and North Weald outperform South Epping as a sustainable development. Both sites comprise a more viable and deliverable solution to meeting the housing need in this area.

The vision in planning policy of the Local Plan is that the residents of the 950 houses in South Epping would walk or cycle to the facilities in Epping.

No consideration appears to have been given to the practicalities of this and it is based on questionable assumptions. The South Epping site location is a considerable distance (up to miles away and up a very steep hill) from local amenities as noted above. It is not reasonable to assume that the South Epping site is within walking distance of these local amenities.

### **Pollution**

Air and noise pollution is a significant factor in the viability of future housing development and this increases significantly when living nearer to motorways. The South Epping site abuts the M25 motorway and all the proposed housing is within 400m.

To mitigate pollution large barriers would have to be built next to the raised section of the motorway in order to protect residents.

#### **a) Air Pollution**

The poor air quality is already an issue in South Epping, being close to the M25. Health issues are already a concern.

Traffic fumes are high and dense; and at times can be smelt and seen.

Often this section of the motorway is at capacity, grinding to a halt. The fumes are increased due to the Bell Common tunnel.

A recent study (Lancet 2017) shows that living within 50m of a motorway increases the risk of dementia and this was attributable to fumes and noise. Living near to a motorway exacerbates respiratory and heart conditions and can also shrink brain size. Parkinson's disease, Alzheimer's and Multiple Sclerosis are also believed to be a raised risk. Another study (Imperial / Kings College) linked motorway pollution with permanent and life-limiting damage to children's lungs and unborn babies.

The added traffic of at least 1000 + cars would increase air pollution in Epping considerably.

The South Epping Masterplan significantly underestimates the additional vehicular traffic that would meaningfully increase pollution levels in the town.

#### **b) Noise Pollution**

The level of road noise in Brook Road / Bridge Hill (450 m from the M25) and can be very loud, especially at peak times. This noise level will be increased at the South Epping site due to the homes proximity to the M25 and would therefore severely impact on the residents and their health. There is an increased risk of mental health and dementia (see above) in people living close to a motorway.

The close proximity of the South Epping site to M25 motorway (the majority of the building being within 200m) would have an excessive level of noise pollution.

The proposed building of 950 homes on the South Epping site would see an increased use of cars (see above) and will result in more noise pollution for Epping. The vision from EFDC in their Local plan that most people would walk or cycle from South Epping to their destination is based on incorrect assumptions and is therefore unjustified and unsound.

### **Flooding**

Brook Road and the fields of the South Epping site are regularly waterlogged and flooded. At present the two brooks and the fields on this Green belt site act as a flood plain for the excess water. The South Epping site is at the bottom of Epping and in a three – sided ‘valley’ of steep gradients.

The elevations above sea level are as follows:

- Epping High Road (shops etc.) - 109.9m
- West of South site - Ivy Chimneys/Bell common tunnel - 105m
- M25 motorway edge South Epping site - 80m
- Elevation above sea level of Brook Road – 60m
- Elevation of South Epping site field abutting Brook Road – varying 60m – 68m

As a consequence the excess water drains down on three sides, of between 20 - 50 metres, to Brook Road and the South Epping site; effectively creating a ‘bowl’ of waterlogged land for a great proportion of this site.

No consideration has been presented in respect to flood risk or the cost of additional drainage requirements. The addition of 950 houses would not only be prone to flooding but also increase the flood risk greatly, both to the existing houses in Brook Road, and the new homes. Other sites for development do not suffer from the same risk.

### **Infrastructure and Delivery Requirements**

At meeting of 14/12/17 EFDC agreed that ‘... **the necessary infrastructure would be in place before a brick is laid...**’ in response to an assurance requested and raised by Councillor Avey.

**The building of infrastructure must precede the building of new homes. This is a key requirement to the development of the historic market town of Epping.**

The prerequisite infrastructure includes but is not limited to:

- The South Epping site requires the building of a relief road crossing the Central Line (either over or under) cost of £10 million +
- The delivery requirements of a 10 year building plan for South Epping – 50 houses per year (2022-2033) against a quicker and shorter time delivery plan for East Epping and North weald Golf Course.
- New local school to be built
- New heath/surgery to be built
- There are high voltage cables on the South Epping site – cost of removal or proximity implications

to health if not. Greatly reduces development capacity / increases density.

- There is an oil pipe line on the South Epping site – implication of costing constraints and / or relaying.
- Impact on water and sewage systems – Development to the south of Epping would require significant network upgrades.

No plan as to who will be responsible for funding the above has been presented.

The local roads are heavily congested (especially between 07:00- 09:15 & 15:00 – 19:00pm; the bridge under the Central Line (Brook Road /Bridge Hill) is a bottleneck and an added 1000+ cars will only add to this congestion. A large development in South Epping would have a very adverse impact on congestion and current infrastructure; with an extra 2500 road users.

The additional infrastructure requirements are significantly greater at the South Epping site compared to the alternate sites. This does not seem to have been considered in the EDC plans.

Adequate assurances that infrastructure requirements will be delivered BEFORE development are not in evidence in the Masterplan for South Epping and so the plan is unjustified and not sound.

### **Density of Development**

The market town of Epping (population 15700) has a population density of 9.8 persons per hectare. This is characterised by areas of building intermingled within the Green Belt, farmland, fields, woodland, play areas and parks. Epping Hemnall Ward (South Epping) has a population density of 13.1.

The development of South Epping would create a housing area with a population density of at least 40+ persons per hectare, compared to 20 for the East Epping site, and would destroy the inherent character of the market town of Epping and the council's vision set out in the Local Plan.

Therefore the Submission Version of the Local Plan is unjustified and therefore is not sound.

### **Other Points of Interest**

- Surveys for traffic congestion/ surgery capacity/ Central Line capacity/ schools capacity and air and noise pollution by ARUP and other agencies were carried out at times or locations when results would be more favourable for EFDC outcome and do not reflect the true levels.
- EFDC did not take the views from the public via the various questionnaires and consultations into consideration when making their decision (see EFDC Plan Report on Site Selection Appendix C). Consequently the community feeling was not in evidence as being considered.
- EFDC had to adopt the Local Plan at the EGM of 14/12/17 in order to meet the publication date and the Government deadline of 31/03/18. Many of the 58 councillors were 'persuaded' by comments and 'railroaded' into changing their original vote (against the Plan) to one in favour of adopting the Local Plan that evening. The 'threat' of the additional allocation of another 9000+ houses to the district by the Government if the Local Plan wasn't passed that evening, was a point raised by various different councillors on numerous occasions. For example "If you don't approve the Local Plan then it's ten times worse" (Cllr John Philip) "If you (sic. Council) miss the publication date then we can't meet the Government deadline of 31/03/18 so there will be 20,000 homes not 11,000." (Cllr Mark Beard).
- The old Epping Primary School site has been derelict for 10 years; a smaller development site

available which is close to all amenities that Epping offers.

- Only six weeks was given to look at the Local Plan; two of those were over Christmas and New Year.
- Copies of the Submission Version Local plans were not available from EFDC until the beginning of January. There are at present 305 houses which are vacant (and have been for over 6 months) in EFDC which can be put back into use as housing (Housing Act 2004) with an EDMO (Empty Dwelling Management Order).

### **Closing Statement**

**The evidence provided by EFDC for the Local Plan does not support the argument for the development of the South Epping site as the most appropriate strategy for meeting the additional housing requirements in Epping. When considered against the reasonable alternatives, and based on the proportionate evidence above, the alternative sites of East Epping and North Weald Golf Course (as well as Theydon Bois and possibly Thornwood) offer a more viable, cost effective, deliverable and sustainable solution. The Local Plan for Epping South is unjustified as it does not meet the test of the plan and therefore should be considered unsound.**

**EFDC have failed in meeting the required tests to maximise the effectiveness for development within the Local Plan.**

**Signed:**