

Representation form: Consultation on the Main Modifications to the emerging Local Plan

This form should be used to make representations on the Main Modifications to the Epping Forest District Local Plan Submission Version 2017 to the Local Plan Inspector. The Main Modifications Schedule, online response form and all required supporting documentation can be accessed via the Examination website at www.efdclocalplan.org. Please complete and return representations by Thursday 23rd September 2021 at 5pm.

Please note, the content of your representation including your name will be published online and included in public reports and documents.

It is important that you refer to the [guidance notes](#) on the Examination website before completing this form.

The quickest and easiest way to make representations is via the online response form at www.efdclocalplan.org.

If you need to use this downloadable version of the form please email any representations to MMCons@eppingforestdc.gov.uk

Or post to: MM Consultation 2021, Planning Policy, Epping Forest District Council, Civic Offices, 323 High Street, Epping, Essex, CM16 4BZ

By 5pm on Thursday 23rd September 2021

This form is in two parts:

Part A – Your Details

Part B – Your representation(s) on the Main Modifications and/or supporting documents. Please fill in a separate Part B for each representation you wish to make.

The Main Modifications Schedule and supporting documents to the Main Modifications can be accessed online at www.efdclocalplan.org. The supporting documents to the Main Modifications are listed below. Representations concerning their content will be accepted to the extent that they are relevant to inform your comments on the Main Modifications. However, you should avoid lengthy comments on the evidence/background documents themselves.

- A. Council's response to Actions outlined in Inspector's post examination hearing advice (Examination document reference number ED98), July 2021 (ED133)
- B. Sustainability Appraisal Report Addendum, June 2021 (June 2021) (ED128/ EB210)

- C. 2021 Habitats Regulations Assessment, June 2021 (ED129A-B/EB211A-B)
- D. Epping Forest Interim Air Pollution Mitigation Strategy, December 2020 (ED126/ EB212)
- E. EFDC response to Inspector's Post Hearing Action 5 and supplementary questions of 16 June 2021, July 2021 (ED127)
- F. Epping Forest District Council Green Infrastructure Strategy (ED124A-G/ EB159A-G)
- G. Harlow and Gilston Garden Town Latton Priory Access Strategy Assessment Report, July 2020 (ED121A-C/EB1420A-C)
- H. Revised Appendix 2 to the Epping Forest District Council Open Space Strategy (EB703), July 2021 (ED125/EB703A)
- I. IDP: Part B Infrastructure Delivery Schedule 2020 Update (ED117/EB1118)
- J. EFDC Consolidated and Updated Viability Evidence 2020 (ED116/ EB1117) Consolidated
- K. Statement of Common Ground Addendum East of Harlow, September 2020 (ED122A-B)
- L. South Epping Masterplan Area Capacity Analysis (Sites EPP.R1 and EPP.R2), March 2020 (ED120/ EB1421)
- M. In addition to the above there are a number of Examination Documents, which include Homework Notes produced by the Council as a result of actions identified by the Inspector at the hearing sessions as well correspondence between the Council and the Inspector following hearings. These Examination Documents can all be accessed on the [Local Plan website](#).

Please only attach documents essential to support your representation. You do not need to attach representations you have made at previous stages.

Part A – Your Details

1. Are you making this representation as? (Please tick as appropriate)

a) Resident or Member of the General Public ☐ or

b) Statutory Consultee, Local Authority or Town and Parish Council ☐ or

c) Landowner ☐ or

d) Agent ☐

Other organisation (please specify)

Liberal Democrat district councillors for Epping Hemnall: Cherry McCredie, Janet Whitehouse and Jon Whitehouse

2. Personal Details

3. Agent's Details (if applicable)

Title

Cllr

First Name

Jon

Last Name

Whitehouse

Job Title

(where relevant)

Organisation

(where relevant)

Liberal Democrat district councillors for Epping Hemnall: Cherry McCredie, Janet Whitehouse and Jon Whitehouse

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone
Number

E-mail Address

Part B – Your representation on the 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

4. Which **Main Modification number and/or supporting document** does your representation relate to? (Each Main Modification within the Schedule has a reference number. This can be found in the first column i.e. MM1, MM2 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 Main Modifications. You should avoid lengthy comments on the supporting documents themselves.

MM no.

Supporting document reference

5. Do you consider this **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 **Main Modification and/or supporting document** is not legally compliant or is unsound. Please be as precise as possible. 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.

We support the inclusion of references to the historic environment and natural environment because of the importance of these matters to the character and distinctiveness of Epping Forest district and the contribution these factors make to local quality of life and sustainability.

The requirement for public transport, walking and cycling infrastructure to “**be promoted to residents**” is weak and should be replaced with “**be implemented to serve residents**” in order to ensure the plan is positively prepared and meets infrastructure requirements

We support the inclusion of “**air quality will be improved**” because of the importance of this to human health in the district and also the conservation of the Epping Forest SAC

7. Please set out what change(s) you consider necessary to make the **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 as possible.

Replace

“public transport, walking and cycling infrastructure be promoted to residents,”

with

“public transport, walking and cycling infrastructure be implemented to serve residents,”

or words to the same effect

This will help the plan to meet the requirement to be positively prepared by meeting infrastructure requirements

(Continue on a separate sheet if necessary)

10. Have you attached any documents with this representation which specifically relate to an MM or supporting document?

☐

Yes

☒

No

Signature:

Jon Whitehouse

Date

22/9/21

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

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c) Is Legally compliant Yes No

d) Sound Yes No

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The Epping Forest Air Pollution Mitigation Strategy sets out measures that the Council proposes to implement during the lifetime of the Plan. However, there is no evidence the strategy can or will be delivered. It is already behind schedule and the measure that forms the major part of the strategy (the chargeable “Clean Air Zone”) requires the active support and involvement of Essex County Council, London Borough of Waltham Forest and London Borough of Redbridge as highways authorities. None of these highways authorities have indicated support for the proposed CAZ.

Furthermore implementation of the proposed chargeable CAZ would undermine other objectives of the plan relating to health and air pollution: most notably the diversion of the most polluting traffic from forest roads onto other roads in the district would negatively affect human health.

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Redrafting of the Air Pollution Strategy to (a) remove the chargeable Clean Air Zone measure and (b) include additional effective measures to improve air quality.

If this cannot be achieved the level and trajectory of development in Epping Forest will need to be adjusted in order to meet the required air quality standard.

(Continue on a separate sheet if necessary)

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Signature:

Jon Whitehouse

Date

23/9/21

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f) Sound Yes No

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Site EPP.R5

We support "A new leisure centre will be provided in Epping to replace the facility currently located at site EPP.R5." This is a change we attempted to make in December 2017 pre-submission. The Built Facilities Strategy identifies under-provision of sports halls in the district including the Epping area and this change also helps to address concerns raised by Sport England in its representations.

South Epping Masterplan area

The modification deletes the requirement for the South Epping Strategic Masterplan to make provision for a new vehicular pedestrian and cycling bridge over the railway (point vi). This will increase the volume of traffic travelling under the Brook Road / Bridge Hill railway bridge via Ivy Chimneys / Bridge Hill and Brook Road. The highways network is already very congested at peak times and constrained by physical factors including the narrow railway bridges at Brook Road and Bower Hill (on the route from south Epping to Epping Station and the town centre).

The absence of a high-quality connection over the railway line and reliance on the current sub-standard footbridge will mean the two halves of the masterplan area are effectively severed into two distinct housing estates rather than being a single community.

If the bridge has been removed for viability reasons this is further evidence that the South Epping masterplan site is not suitable for development as it cannot deliver the infrastructure required to meet national and local planning policies.

We support the inclusion of veteran trees in point xii.

The wording “*retention or reprovision*” of Brook Road Recreation Ground (point xv) is insufficient to meet the needs of a 450-dwelling development. The masterplan should ensure play and recreation facilities are enhanced to meet the needs of the new residents either at the existing location or elsewhere in the masterplan area.

The evidence does not show that the proposed “Suitable Alternative Natural Greenspace” can be provided effectively within the masterplan area. The Green Infrastructure Strategy requires a SANG to be of a standard that will encourage its use in preference to the SAC and we question whether this can be achieved given the site constraints, particularly if the SANG is located close to the motorway and therefore suffers from noise pollution and poor air quality.

Epping Forest is a short walk away on public footpaths (over the M25 footbridge to access the forest at Theydon Bois Golf Club and alongside the Ivy Chimneys recreation ground to access the forest towards Bell Common) and likely to be a more attractive destination.

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Removal of the South Epping Masterplan Area from the plan would still enable the delivery of the housing requirements set out earlier in the plan, would reduce the pressure on the Epping Forest SAC from recreation and air quality impacts and avoid the other negative highways, environmental, residential amenity and infrastructure impacts of the proposed development which are not currently mitigated by the plan and main modifications.

If the site is retained, the masterplan should require effective high-quality connections between the two parts of the masterplan area that enable residents, including those with mobility difficulties, to access local facilities (including school, retail, community and play and recreation facilities) without placing additional pressure on the already congested Brook Road / Bridge Hill / Ivy Chimneys route.

If the site is retained, point xv should require the retention or re-provision of and upgraded Brook Road Recreation Ground.

Additional land may be required to deliver a SANG that meets requirements.

(Continue on a separate sheet if necessary)

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Jon Whitehouse

Date

23 / 9/ 21

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g) Is Legally compliant Yes ☒ No ☐

h) Sound Yes ☒ No ☐

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We support the additional paragraph:

“Closure of the existing Epping Library and the re-development of this site should not take place until a suitable replacement library facility is delivered and is operational subject to the requirements of Essex County Council. This is to ensure that the public has an uninterrupted access to library services in Epping”

which reflects the vote taken by full council in December 2017 to include this requirement in the submission local plan

(Continue on a separate sheet if necessary)

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