



**Epping Forest  
District Council**

www.eppingforestdc.gov.uk



## Representation form for Submission Version of the Epping Forest District Local Plan 2011-2033 (Regulation 19 publication)

This form should be used to make representations on the Submission Version of the Epping Forest District Local Plan which has been published. Please complete and return by 29 January 2018 at 5pm. An electronic version of the form is available at <http://www.efdclocalplan.org/>

**Please refer to the guidance notes available before completing this form.**

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**Please return any representations to: Planning Policy, Epping Forest District Council, Civic Offices, 323 High Street, Epping, Essex, CM16 4BZ**

Or email them to: [LDFconsult@eppingforestdc.gov.uk](mailto:LDFconsult@eppingforestdc.gov.uk)

**BY 5pm on 29 January 2018**

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This form has two parts – Part

A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

***Please attach any documents you wish to submit with your representation***

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### Part A

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)

CPRE Essex

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Tel/Fax: [REDACTED]

Email: [REDACTED]

December 2017

2. Personal Details

3. Agent's Details (if applicable)

Mrs Patricia Moxey  
Vice Chairman, CPRE Essex

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Tel/Fax: [REDACTED]

Email: [REDACTED]

December 2017

**Part B – If necessary please complete a separate Part B form for each representation**



4. To which part of the Submission Version of the Local Plan does this representation relate? (Please specify where appropriate)

Paragraph	<input type="text"/>	Policy	Infrastructure Urban Intensification Green Belt	Policies Map	<input type="text"/>
Site Reference	<input type="text"/>		Settlement	Whole of district	

5. Do you consider this part of the Submission Version of the Local Plan:

\*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

c) Complies with the  Yes duty to co-operate  No

6. Please give details of why you consider the Submission Version of the Local Plan is not legally compliant, is unsound or fails to comply with the duty to co-operate. 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

#### INFRASTRUCTURE DEFICIT / INADEQUATE INFRASTRUCTURE PROVISION

The District as a whole continues to suffer from the lack of decent infrastructure to meet local demand. Almost all roads are suffering from excess traffic usage and air quality is correspondingly poor. Added to this, the existing sewerage systems in most towns is antiquated and not up to coping with the increased drainage from additional properties.

The Plan appears to use a broad-brush approach with little or no vision or recognition of the current problems facing residents and the adverse effects of additional development across the District. There is too much reliance on other agencies to deliver vital infrastructure improvements and the deficit in the overall strategic infrastructure provision is such that a range of piecemeal Section 106 agreements on individual sites cannot successfully address. CPREssex therefore questions whether the proposed levels of development are sustainable given the existing deficit, congestion issues and the added vehicular movements that will be generated by the scale of development in certain locations.

The situation at Harlow seems to exemplify this issue. Whilst the largest increases in housing are proposed for the Garden Town sites - effectively urban extensions to Harlow New Town - there is considerable doubt that the necessary transport infrastructure, especially public transport provision, will be delivered in tandem.

Apart from work on the M11 junctions, the strategic transport infrastructure requirements crucial for the effective delivery of a 20% increase in housing proposed for the District do not appear suitably robust. It is, therefore, not at

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all clear how the required infrastructure will keep up with the pace of proposed development.

The rail network capacity would already appear to be entirely inadequate for current needs, let alone those of the future, and access to the rail stations are not particularly favourable for these proposed developments at Latton Priory and East of Harlow.

There is further concern that the large scale proposals at North Weald do not seem to have any concomitant infrastructure and this housing development could significantly increase road traffic through Epping Forest. It does not seem sustainable without considerable new transport infrastructure including a new link to the A414.

There is also concern about capacity constraints on the Central Line - with services already congested at peak times. The situation will deteriorate with the proposed number of additional dwellings for Epping and Loughton (around 2.5k) - which could result in several hundred additional peak time passengers per day - while there are known constraints which restrict the ability of TfL to increase capacity (eg dimensions of the tunnels; platform lengths in central London; signal system).

CPREssex is not convinced that the range and quality of necessary infrastructure will be provided to the scale required to secure sustainable development rather than adding to the congestion on the road network. It is not clear whether the locations and the quantum of housing would achieve this objective. The evidence for provision of new supporting public transport infrastructure (as opposed to more road- building) seems thin.

As a result, the Plan is considered to be unsound.

## **URBAN INTENSIFICATION**

It seems logical to concentrate development and housing around Harlow to help improve the town's economic prospects, and, in this respect, it is appropriate that the potential for development around Harlow should be maximised. Strategic housing allocations based on the extension of existing settlements is the option providing an acceptable way forward in meeting housing need in a District that is 94% Green Belt. Nevertheless, these additional houses will add significantly to the traffic movements as it will be a dormitory settlement without the public transport alternative.

The prospect of delivering 16k houses in the three/four locations around Harlow before the end of the Plan period (2033) would seem to be highly optimistic given the commercial and physical limits on phasing and release. Research by Nathaniel Lichfield published in November 2016 ('How Quickly do Large Housing Sites Deliver') provides some helpful evidence about the scope for large sites to deliver numbers of completed homes quickly, and demonstrates that both LPAs and promoters/developers are always tempted to be over optimistic about the speed with which they can come forward. In summary, the Report confirms the average length of time from planning application submission to first housing completion is in the order of 5.3-6.9 years on larger sites. It also finds that the average annual build out rate is 161 homes per annum.

Given that the proposed Garden Town locations are all in close proximity, phasing and release of homes will be particularly significant. Even at an optimistic completion rate of 650pa combined, this would take almost 25 years to deliver the full target of 16k. Added to this, the assumption that it takes on average 6 years before first completion from the date of submission of planning application, means that it's likely to be 2025 at the earliest before the first houses are on the market.

For this reason, the Plan is considered to be unsound.

## **LOSS OF GREEN BELT**

There is large scale opposition to the principle of development in the Green Belt and concern about London sprawl and suburbanisation of settlements in the south of the District. However, the Plan indicates that there will be considerable number of changes to the boundary of the Metropolitan Green Belt, quoting exceptional circumstances as the reason for doing so. Whilst CPRE Essex is also opposed to this in principle, it recognises that the opportunities for delivering the level of development envisaged is massively constrained by this policy designation as it currently stands. In this respect, the Review of the Green Belt undertaken by LUC has identified some acceptable areas adjacent to larger settlements where a boundary revision provides for the District's

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projected growth in sustainable locations.

However, there is serious concern that the proposed changes to the MGB are flawed. The changes south of Harlow to facilitate development at Latton Priory is particularly inappropriate, situated as it is in an expanse of rolling Essex countryside, containing a fine ancient landscape and potentially rich in unrecorded archaeology. The loss of very good quality agricultural land (Grade 2) here and associated with the other Garden Town locations is considered inappropriate given the growing concerns about food miles, provenance and the ability to become more self-sustaining.

Nationally, CPRE advocates a “brownfield first” approach and would therefore wish to be assured that all brownfield land in the District has been identified through the compilation of a Brownfield Land Register in advance of necessitating alterations to the boundary of the MGB.

For this reason, the Plan is considered to be unsound.

#### Increased risk of Flooding

It is also important to note that The Strategic Flood Risk Assessment Level 1 Update 2015 (SFRA) identifies surface water run-off as the greatest risk to the District with regard to flooding. Whilst the Council currently has in place one Surface Water Management Plan for Loughton, Buckhurst Hill and Theydon Bois (2016), this is operational with regard to the current location of open land which can absorb rainfall reducing the risk of flooding.

The upward movement of rain clouds over the high ground of the Epping Forest ridge already produces a greater amount of precipitation than elsewhere in Essex and with climate change this pattern of heavy downpours over the urban areas within the district is likely to be intensified. The urban areas of Epping and North Weald are within this rain shadow and any future loss of open land which can at the moment soak up precipitation will require careful modelling to ensure flood risk is minimised.

#### The loss of farmland at proposed

*(Continue on a separate sheet if necessary)*

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**7. Please set out what change(s) you consider necessary to make the Submission Version of the Local Plan 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.**

As CPREssex is not convinced that the range and quality of necessary infrastructure will be provided to the scale required to secure sustainable development rather than adding to the congestion on the road network, further assurances are required.

There seems to be an over optimistic completion rate of 650pa combined and at this rate it this would take almost 25 years to deliver the full target of 16k. Added to this, the assumption that it takes on average 6 years before first completion from the date of submission of planning application, means that it's likely to be 2025 at the earliest before the first houses are on the market. There are worrying potential bottlenecks on building targets which will cause considerable local distribution over several years with consequent impact on the local economy and health and well being of the local residents, many of whom are already rather stressed with the high cost of living within the overcrowded south east.

CPRE advocates a “brownfield first” approach and would therefore wish to be assured that all brownfield land in the District has been identified through the compilation of a Brownfield Land Register in advance of necessitating alterations to the boundary of the MGB.

*Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.*

*(Continue on a separate sheet if necessary)*

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

	No, I do not wish to participate at the hearings	at	x	Yes, I wish to participate at the	at the hearings
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December 2017

9. If you wish to participate at the hearings, please outline why you consider this to be necessary:

To personally clarify the reasons set out above if the Inspector wishes to raise any queries.

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

10. Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination (Please tick)

Yes

No

11. Have you attached any documents with this representation?

Yes

No

Signature:

A large black rectangular redaction covers the signature area.

28 January  
2018

Date: