

REPRESENTATION

I contend that the proposed "South Epping Masterplan" (EPP.R1 and EPP.R2) is fundamentally unsound and cannot be justified. It should therefore be rejected.

I am making this representation as: a resident

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The Local Plan can only fail if it can be proven to be unsound. A Local Plan can only be considered "sound" if it can be "justified". The National Planning Policy Framework (NPPF) requires that:

"for a plan to be justified, it should be "the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence".

The South Epping Masterplan fails crucial tests of soundness

25th January 2018

Dear Sir/Madam,

Epping Forest Local Plan -Policy SP 2

(i) EPP.R1 Land South of Epping, West – Approximately 450 homes

(ii) EPP.R2 Land South of Epping, East – Approximately 500 homes

I am writing to express my concerns around the proposed development EFDC voted through the amended Local Plan through in mid-December. In particular the doubling of the number of proposed houses south of Brook Road from 245 to 500 and the 450 houses proposed south of Ivy Chimneys Road.

The proposal destroys prime green belt and will place a huge number of houses next to the busiest road in the country. Not to mention the cost of going over/under the Central Line with a relief road is now projected to be £10million. It is not a logical place to build and it makes no economic sense.

I believe the plans for much of the development in Epping fails the tests of soundness required, and I believe the South Epping element is particularly flawed. The South Epping masterplan does not meet the test of the plan as being justified, and is therefore unsound. EFDC should be following an evidence-based approach and they have utterly failed to demonstrate this.

1. Site Constraint. Noise and air pollution would need to be mitigated as the proposed site is next to the busiest road in the country. To mitigate pollution, huge barriers would need to be built next to the raised section of a motorway to protect future residents. The site contains high voltage cables/pylons. The site contains oil pipelines. The site has Tree Preservation Orders (TPOs). The area has ancient woodland. The site contains BAP habitat (defined as "an area under threat requiring conservation action").

The Council retains one small AQMA for the Bell Common junction, which remains above the 40µg/m³. This junction would be put under increased pressure during development and also on completion of developments. As I will go on to point out development here will require car use because of the topography and location to amenities. Please see fig.1 at the end of this letter which is taken from the 2016 Air Quality Annual Status Report (ASR) and shows Epping Bell Vue (Bell Common) to be in excess of the recommendations in each year I am able to find information from 2011 and in many years significantly over the 40µg/m³.

"Because the single largest influence on air quality in the District is the motor car, the Council is generally reliant on national strategies and vehicle emissions regulations for the improvement of air quality" – South Epping appears to not meet that criteria.

As detailed in Policy Guidance LAQM.PG16 (Chapter 7), local authorities are expected to work towards reducing emissions and/or concentrations of PM2.5 (particulate matter with an aerodynamic diameter of 2.5µm or less). There is clear evidence that PM2.5 has a significant impact on human health, including premature mortality, allergic reactions, and cardiovascular diseases.

What might happen should the M25 need to be widened again in the future – what impact would the M25 continuing its trend of getting busier have on the health of residents moving to a South Epping development and would it therefore be a viable project for developers.

2. Sustainability of location. The proposed development would be far from the tube station, Epping shops, doctor surgery and St Johns Senior School. The result will be a huge increase in local traffic as it would be an impossibility to walk or cycle uphill to Epping from this location for most people.

3. Infrastructure Requirements. Requires a relief road over/under the Central Line at a cost estimated of £10million. This money should be saved and spent on essential infrastructure. Working with TFL would be an extreme challenge while this big civil engineering project is being undertaken and I would assume could include a closure of the Central Line to allow for works to be completed.

4. Removal of Green Belt South of Epping would be "High Risk". Other potential sites (e.g. East of the Orchards/North Weald Golf Course) are considered Low or Medium Risk. These sites were removed from the plans without any reasons given as far as I can see as a local resident. EFDC risk multiple Judicial Reviews if changes to any Green Belt boundaries are made to accommodate unsubstantiated housing 'need' as this will be clearly contrary to NPPF as no very special circumstances exist. Housing need does not constitute very special circumstances. Our very own Prime Minister expressed this very view in the Houses of Parliament very recently. Historic figures for growth in the district projected forward show nothing like the amount of housing 'need' the Council are foisting upon the district and its future generations. EFDC need to responsibly protect the environment of the district. Everyone will feel the ill effects of this over-development of the district and permanent loss of Green Belt.

5. Land Assembly. There are six separate landowners of land in south Epping which means that the land has not been promoted as a single cohesive development.

6. Access and highways. Brook Road/Ivy Chimneys Road are single track in places and cannot take any increase in traffic. It would be impossible for construction traffic to use them. There is also a low bridge in this area which already creates a very dangerous junction where many school children pass on their way to Ivy Chimneys Primary School. There is no obvious access to the western parcel. There is very restricted access to the eastern parcel via Flux's Lane though this regularly floods and is situated in parts unmaintained road surfaces. See Fig 2 below shows the Brook at Brook Road/Flux's Lane flooding.

7. Development Benefits. Alternative sites already include key infrastructure in their proposals (Primary School, GP Surgery, Leisure facilities etc). There is nothing guaranteed for south Epping in the Local Plan which is simply shocking. Speaking from personal recent experience I can say that primary school places in the South Epping are a serious problem already and there is no mention of how this would be alleviated. We live within priority catchment to Ivy Chimneys Primary school and were reliably informed by the School that we were the first family living within this to have a child not be offered a place in the September 2016 intake. This is a personal situation and I accept that isn't grounds for objections in the grander scheme of things – however we were offered a place at Theydon Bois Primary School which because of the location requires us to drive our daughter to and from School each day (using Brook Road/Bridge Hill/Ivy Chimneys Road) at peak time. Often the road is blocked due to a lack of passing places, commuter parking in dangerous spots on Bridge Hill or large vehicles. So we experience first hand the issues the roads the South Epping development will affect, but also we are forced to drive as opposed to the short walk to Ivy Chimneys Primary School which the district would perhaps prefer in light of the policy of getting people out of the motor car. Others I fear would experience the same situation and the problems become worse.

So, what reasonable alternatives exist?

There are two obvious, large sites that exist and are available. They are more appropriate, sustainable, and economically viable, but currently not in the Local Plan.

These are namely land East of the Orchards and North Weald Golf Course - sites that currently have land owners/developers interested and keen to build.

Also, Theydon Bois has been allocated just 58 houses in the Local Plan and could easily take 500-1000 houses to the east. All within walking distance of the tube station. Though for no known reasons again these areas or sites have been dropped. There is

strong local feeling that it is important good valid reasons against the alternatives should be published before any plan including the less viable sites is granted. These decisions will affect peoples lives for generations and change the local environment forever and seem to be ill considered.

Mr R Ley

[REDACTED]

Fig 1.

Table A.2 – Annual Mean NO₂ Monitoring Results

Site Name	Site Type	Monitoring Type	Valid Data Points For Monitoring Interval (%)	Valid Data Points 2015 (%)	NO ₂ Annual Mean Concentration (µg/m ³)				
					2011	2012	2013	2014	2015
Chilgrove Halewell Road	Roadside triplicate	Diffusion tube	97.2%	75%	35	34	36	35	39
Epping 15 High Street	Urban Background triplicate	Diffusion tube	100%	75%	29	30	30	31	25
Epping Rail Vic	Roadside triplicate	Diffusion tube	100%	75%	61	57	52	52	42
Epping Ladbroke	Roadside triplicate	Diffusion tube	100%	75%	37	30	35	36	34
Epping Sundering	Roadside triplicate	Diffusion tube	100%	75%	29	43	43	42	36
Hoodwood Canees Cottages	Urban Background triplicate	Diffusion tube	100%	75%	27	28	28	26	16
Longdon 2 Church Hill	Roadside calculation	Diffusion tube	100%	75%	34	30	30	35	28

Fig 2.

