



....Redacted.....
....Redacted.....
....Redacted.....

The Epping Society Responses to ED 130 - EFDC Schedule of Main Modifications to the Local Plan, in the light of Inspection, and other documents. Published July 2021 Deadline 23 September

General points:

- The presentation of the documents is not easy to follow; There are 244 pages, with 222 Main Modifications and Appendices, plus Additional Modifications, Supporting Documents A-M and a range of Mapping documents. We found some overlaps, repetition and contradictions, a worrying lack of clarity.
- The Inspector had set 35 Homeworks and a list of Actions Required; there are Hearing Statements and Actions cross-referenced in various places. The Tracker published by EFDC appears to have not been recently updated. We are not certain that all questions raised have been approached; but we believe the Inspector will have a strong hand on that. The online version of the MMs could have been indexed back to the LPSV; also it was not searchable, so consultees had to plough through multiple pages to find items of interest – Epping Society found this a serious and almost insurmountable obstacle.
- Some MMs are presented nicely in whole paragraphs, while others are clauses only, lacking context; others again are parts of a sentence only – one has to pull out the originals to review. Again, this limits public accessibility.
- We suggest that the document is well-nigh impenetrable to all but professionals and the very-determined. It would perhaps have been simpler to reissue the Plan using colour coding, or an MS Trackchanger – although given some major restructuring eg removal of SP1, we can see that it would still be a challenge.
- An additional column in the ED130 table indicating “Topic” would have made searching easier. Alternately, brief notes in column 3.
- This task would have been impossible for those without IT equipment and a fairly high skill level; it therefore makes for an unfair Consultation.
- The Epping Society has worked by dividing the task amongst our Planning Subcommittee, with occasional reference to other parties who had been present at the Hearings, e.g. who had made marginal contemporary notes as to what was agreed.
- Having said that, we accept that a significant part of ED130 is tidying and tightening up; the final document should be clearer for all concerned.
- We have not considered the AMs as EFDC have said they are not being consulted-upon. We are anxious they could change the plan in meaningful ways without public input.
- The restriction on how responses can be made is cumbersome and impractical for us (because of the number of our comments) so we anticipate that the form of our response will be accepted.

- We note that the Submission Version of the Local Plan was approved by the full Council as far back as 2017 since when four years have elapsed and Council elections have been held. Circumstances have changed a great deal and a review of the Local Plan will shortly be upon us. We wish to make strong representations about the evident inadequacy of the 2017 plan that it has taken so long and requires so many MMs to get it towards an acceptable format.
- It is odd that documents such as EB 1421 are bundled in this package. If the Inspector is satisfied with the LP in general, it then conveys a measure of approval on e.g. the South Epping Master Plan – which could constrain the future planning process. “We can’t change it now; the Inspector has approved it”.
- A very major omission from the documents is a high level of concern and planned immediate action for Climate Change. It is present very rarely, usually in the context of flooding, and tangentially of EVs. EFDC has long had a declared Climate Change Emergency; there are EFDC policies such as a Climate Change Action Plan to which we cannot find any reference at all; far less action. The CCAP is still in draft, but the consultation & review dates have been allowed to run now over a month overdue. Where are heat pumps, community heating, thermal buildings, grey water, solar panels etc? Yet this is the Number One Global concern we should all be addressing – for example thousands of new homes could make CC worse unless they are the right design and location. It is unthinkable that a District Council should be presenting a plan covering until the 2030s without major preparations on this issue. We would hope that the Inspector would regard such additions as necessary improvements to the LP.
-

In summary, The Epping Society advises that these Major Modifications may well be legal (although we do not feel entirely qualified to make that judgement); but we do not consider that they render the Local Plan “sound”.

MM	Comments
Pre- amble	Removal of SP1 to NPPF makes sense
General	We note the removal of “EU” (etc), often replaced by “international”. That is not an equivalent substitution. EU Regulations were legally binding, whereas international circumstances are only advisory to an independent UK. The interpretation of the latter is not the responsibility of a Local Authority, but for national Government.
General	Reference to Green infrastructure; all should be corrected to “Green & Blue”?
8	Which NPPF? Need to specify date. Please see back to the Inspector’s decision in the Hearings. Precision here may be crucial if disputes arise.
8	2.35 “conditions in the District” At this point the Epping Society would have hoped to see the formal adoption of a code of Design Standards.
8	2.39 good to see “without delay” deleted – as a loss of local input, and haste were

	looming.
8	At (viii) the tense changes: “will have been”, instead of “will be”. Please justify or clarify
8	(ix) has “be promoted” whereas we would prefer “will be”.
11	Can we have an update of homes built to date, not March 2020, together with current approvals? It would be helpful to also know the age of approvals still not completed as that would allow us and the Inspector to judge if they were realistic (see table – a 10% uplift seems over-simplistic, and may cover a “gap” in provision)
11	Total numbers. The Local Plan remains focussed on delivering the original number of new homes. The ONS revised their “demand” number, and the Inspector invited EFDC to review the LP accordingly – however, Council refused. Epping Society continues to be dismayed that EFDC chose not to seize a Golden Opportunity to take some of the pressure off local communities, by reducing the total required by almost a half – issues such as Green Belt, traffic, parking, Forest, pollution, could all have been to some extent mitigated.
11	“For local people” – we still maintain strongly that the new homes will largely go to incomers; eg the Qualis planning application for the St John’s Road site is explicit on this. Anecdotally nearly all recent new residents we meet are moving out of London. Can EFDC be honest about this please, public confidence is undermined by misrepresentations such as this.
11	No reference to post-Brexit circumstances; nor to Covid implications; both now well-established patterns. ED114 states “a noticeably lower level of household growth”, but no adjustments are made. Examples – reduction of older population due to Covid; reduction in the EU migrant workforce; increase in Working from Home – all affect house numbers & types needed.
11	Has Council estimated the impact of recent changes to Permitted Development – that retail & office spaces unused for 3 months can be converted to residential without Planning Approval? It should be possible to estimate this number, and deduct it from the need for new homes; this would be more sustainable, also reduce the take of Green Belt (both of which are Council Policy). We watch as several local sites receive an application for change of use / Permitted Development; eg Peregrine House; once offices, to be converted into flats. Epping Society would like the Inspector to take a view that these new dwellings should count towards the Council’s building target.
13	“Affordables” = 2851/11400 = 25%. Is this an accurate datum? All the way along we have talked of 40% (see MM 28, ED98); it has been a major selling point for the Plan – quoted as homes for our less well-off local people. See MM5 where a historic shortfall of 665 from 2011-2016 is reported; this figure should be part of the explicit context of the LP. The financial case for non-compliance with affordable housing should be published in each case or else will the Local Plan please include clear numeric criteria? We are concerned about the opacity of decisions. Local confidence in the planning process will be further undermined, if homes for less-well off local people are not delivered.
14	We continue to recommend that redevelopment at higher densities should be a priority above Greenfield sites, and way above Green Belt grabbing. See NPPF on this. Also, there have been several recent Ministerial statements to that effect, of

	which EFDC should take cognisance.
14	<p>Part E – minimum job number quoted; good to see.</p> <p>What rationale has been used to create this number? What mechanisms are proposed?</p> <p>On what date annually will the monitoring be published?</p> <p>Epping Society continues to maintain our concern that the LP does not preserve existing employment sites, eg the Epping Laundry. Loss of employment land , if it is a policy, should be explicit; but it would seem to contradict an employment aspiration. Homes without nearby jobs will cause increased commuting and damage the social community.</p>
15	<p>The sequence of priority is the same as in MM14, but with (i) for Garden Communities. We cannot see why “affordable” properties get the additional first priority. Is this to indicate that the Garden Communities are to have a higher “affordables” percentage? If so the LP needs to be specific.</p> <p>There seems to be no evidence to support the stepped “Projected housing requirement” especially taking into account the deficit from the past.</p>
16	<p>HIAs – good to see. For “large developments” – but how large / small; and who decides?</p> <p>The qualifier “should” is used several times around here. We believe that in the Hearings this was suggested as inadvisable. Is “should” binding or just recommended? There is also at least one “may” - similar argument. Appeals and unfairnesses are the results of this lack of linguistic clarity.</p> <p>The need for new development to meet design standards, including compliance with local vernacular, should be part of the plan. NOTE FOR INSPECTOR: recent planning consents for the demolition and rebuild of a detached house in Epping s=suggest the Council is not attentive to CO2 loss from demolition, not attentive to consistency of design and scale with neighbouring dwellings and not focussed on the protection of TPO trees. Additional and stronger commitments are urgently needed.</p>
16	“Mixed uses and tenures” – but see the Qualis application for St John’s Road site.
16	<p>On the question of Health provision : this was of some concern in the Hearings, now reference should be made to the July 2021 letter from the NHS to Council (part of a recent Qualis planning application). It restates the existing critical shortfall in GP provision in Epping town, where both practices are already massively “over - patiented”. The MMs do not address the existing shortfall, never mind accommodate additional residents. It is to be expected that other areas of the District replicate this problem.</p>
17	<p>Great to see. <u>All</u> proposals <u>must</u> be sustainable. Great to see a list too (education, health, sport etc). We can now expect developments which fail to address these issues being refused?</p>
17	<p>HIAs in here too; repetition?</p> <p>It should be made clear if “ensure” means that the existing Epping Forest would be sufficient to meet the requirement in respect of any or all development sites in the LP.</p> <p>Please make clear if S106 agreements would be sufficient to satisfy this requirement and what reports there will be to voters on the satisfaction of S106 agreements. Can EFDC tell us the dates / amounts of S106 agreements still not satisfied?</p>

	<p>What metrics will be used to ascertain the requirements of the features mentioned?</p> <p>We do not dispute the need for justification for lower than plan densities but we call for higher densities where achievable so as to save as much of the Green Belt (and employment land) as possible.</p> <p>Reference to “Active Design” principles. We can only find these in Sport England documents; so need explaining</p>
19	<p>Last paragraph “pre-requisite” – strongly welcomed. Too many developments have been allowed to start occupancy without provision.</p> <p>Can we please have acceptance of community views in all planning matters?</p> <p>Gibberd’s Harlow design concepts were for a different period when space was no problem so much higher overall densities should be followed to save the Green Belt.</p> <p>We note, and find unacceptable, the proposal to ensure the provision of adequate sustainable transport only in the developments around Harlow.</p>
20 /21	Dorringtons site is in both; merge LP to simplify?
21	<p>Latton Priory: the question of the access road, East to the B1393, Epping Road. The Inspector said she would not want to see this. The maps 2.x and 2.2 now show that route as only a Sustainable Transport Corridor; but the PJA Latton Priory Access Strategy Assessment Report of July 2020 (published with this release) makes an Eastward road their recommended solution. Epping Society wants Latton Priory to belong socioculturally to Harlow, and to make the minimum impact on Epping Forest traffic & air, parking and on the EFSAC. We would suggest that if a road IS built that way, then all properties at Latton Priory should be subject to the Forest surcharge. (A view has been expressed that some of this is related to relative house prices in areas perceived as Harlow versus Epping Forest; and hence to developers’ margins – but that must not be a policy consideration, of course).</p>
21	Are the Travellers’ pitches retained in this LP version?
21	We call for the metric defining “high quality employment” to be stated in the plan and reported annually as above. The last part of 2.126 should not be seen as a reason to dilute the policy.
22	See points made in 11 etc, ref Office for National Statistics data, Covid & Brexit. It may well be that almost NO GB take is needed
22	Land should not be removed from the Green Belt and instead be incorporated into local open space or greenspace categories; as these are less strongly protected and could be rescinded in future. Green Belt designation should always be retained where possible. It is not permitted by NPPF to take Green Belt without urgent specific need, creating new “greenspace” is not that.
23	Good to see clarity on terminology of Local Green Spaces here; but elsewhere we see oddly see “local greenspaces”. Can document be checked for consistency on this please?
24	A definition of “multifunction” please; would avoid uncertainty.
25	“Connecting Green spaces” – yet an application by a subsidiary organisation wholly owned by EFDC (Qualis) for development of the council offices site fails to ensure

	connectivity with other green spaces for the newt pond. How can we have any confidence in the Local Plan if EFDC is itself failing to provide that, on effectively it's own backyard?
27	Can we add "protection of bungalows"? EFDC has a policy, while the LP speaks of a "mixture" of housing types and downsizing; but monthly there are successful planning applications to extend / rebuild bungalows. The Town Council shares our concern in this. Refer to MM8 Vision - "a mix of types) Similarly, that design style & scale should respect adjacent properties?. There have been examples of Councillors failing to give credence to this, despite the urgings of residents and the Town Council
27	MMs 8, 14 & 27 are contradicted by the recent Qualis application to built an estate almost entirely of 1-bedroom flats in blocks, on the St John's Road site. Not following their own policy.
27	Last part deleted: a shame, but we agree that the LP has to be workable.
28/9	Some repetition here – can they be unified, simplified?
35	Need for more retail; what is the evidence for this? Judging by the number of empty shops / charity shops across the District, and the meteoric rise in online shopping, this needs drastic updating
35	Can we have a statement that this will not result in more "shopping estates" (like the Epping Forest Shopping Park in Debden – which has damaged local shops and worsened traffic congestion / pollution in the Rectory Lane area)?
36	More use of flats above shops. Supported. Can Council do more than verbally encourage, eg use variations in Council Tax? However there needs to be a balance; many recent High Street conversions in Epping have now left us short of Office / studio space (which traditionally have been above shops). We know of two companies who have left town for that reason – with a loss of employment locally. We also have to consider the Conservation of historic High Street frontages.
37	Housing for glasshouse workers, fine; but is 3.66 strong enough to stop housing development for general use by stealth, i.e. building a loophole here? As fruit / veg production becomes more automated, we may need more space for greenhouses, but less for their staff. Have there been discussions with the relevant companies?
38	(v) Demolition of such properties if use changes are proposed. We also need to start calculating the environmental costs (CO2 in bricks etc) of any demolition. This should be incorporated into the LP as a "green" factor.
39	Clarification of "better linkages" please
40	EV charging points says "Council will" – which could refer to an unspecified future intention, especially as the previous sentence refers to 2035. This is a bland if expensive provision, but lacks clarity – 3.90 - will charging points be shared, what speed, how long will each car have access?
40	Mention of Bell Common AQMA; but no reference to an Action Plan (still). This junction will carry YET more traffic from ANY new builds in the North of the District, and particularly from the proposed South Epping. The text focusses on CO2 (actually a contributant to plant life, in proportion), but other pollutants and particulates are issues at this critical site too.
40	X.xx "400m from a town centre" is too broad a brush. What if your town centre lacks a range of shops & services, or has poor transport links? Consider North Weald.

41	(iv) The phrase “manage congestion” is defeatist. There are a number of strategies which have yet to be attempted. Surely aiming to reduce congestion would be more aspirational?
41	“Maintain consistency in journey times”. Data produced for Hearings showed we do not currently have this. A drive through Epping can take from 5 – 35 minutes, and the variation is not predictable. (Even much longer still if a motorway is blocked, which happens 4 or 5 times a year – even without Climate protestors!)
41	(vi) “Efficiency of the highway network” – how is this measured? Is there a benchmark? This is a critical issue for local residents & those making journeys. People remain “terrified” by the prospect of a further increase in congestion.
41	F We would like to see the subjective “where appropriate” changed. Who is to decide? The phrase “where appropriate” occurs in several other places too – danger of subjectivity, politics, appeals?
41	PRoW – good to see specific mention.
41	Cycling – the Inspector may remember our cycling speaker”, he points out that there is still no bike rack at EFDC Offices. We know Council are encouraging staff to car share (have results been released?) but how many regularly use a bike?
41	G Council could set an example by installing charging points at their Offices; and by preventing Qualis (wholly-owned subsidiary) from purchasing a new van fleet with <i>diesel</i> power. Any movement towards on-street / lamppost charging, as seen in some London Boroughs, Brighton, Bristol etc?
41	EVs – several references to these, good. However, the policy should be future-proofed by mentioning emerging technologies eg fuel cells, hydrogen power. These may widely available within the lifetime of this Plan.
41	F – “where appropriate”, needs clarification. An effective LP will be harmed by vagueness
41	G – could we have “every” development?
42/3	Repetition?
42	Second part (3.96) has clumsy wording; simplify / clarify?
43	Would this have stopped the developing of land adjacent to the Epping-Ongar railway line, which has made the re-use of that potentially valuable & sustainable link much more difficult? In order to ensure the seriousness of this policy the public need to know just what it might have prevented in the past.
44	First sentence: we think that the “last resort” should be changed to <i>refusal</i> . If this is not stated, either the Council are prepared to soft pedal, or there will be many appeals. This is further complicated by statement in MM45. What commitments will EFDC make as to the use of such compensation and mitigation funds to actually contribute to the stated objectives, rather than, for example, being used for its general purposes?
44	H - “when determined by Council” – is this then to be a subjective / political decision? Does it suggest that the LP proposal is still incomplete; in effect a “blank cheque”? Could we at least have an indicative Biodiversity Impact Calculator threshold as a metric?

44	4.20, in X.xx – “new technologies alone.... will not reduce air pollution”. We would suggest that the Council’s Air Pollution Mitigation Strategy hinges on exactly that premise. For example in January 2021 Cllr Phillips made a public statement, assuring us that the proposed (highly controversial) Clean Air Zone is only a back-up, a very last resort. We believe that EFDC are either confused in this, or are giving out contradictory messages, with one hand assuring us that new technologies should solve it, with the other saying they know this will not happen. We appreciate that Footnote 1. has been inserted to create “variation space” (AKA wriggle room). Just how effective these new technologies become depends largely on how strongly Council drives these changes, also see our notes on MM40/41. Reference should also be made to EFDC’s “Managing the effects of air pollution on the Epping Forest Special Area of Conservation – July 2020 – “novel measures” (5.37)
44	4.23 – change from “significant” to “any adverse effects” is praiseworthy, and represents a major change. Should be emphasised. The recent refusal of the Next application may be the first green shoots of this; thanks.
44	Any survey data / consideration of the impact of introduction of car parking charges in the Forest? That will have reduced recreational pressure.
45	Again there is aspirational wording – “seek to”; and again, the “last resort” – we consider it should say “ <i>refusal.</i> ”
46	In 4.23, X.XX We believe that this relies on visitor surveys of 2017 - 9; is there nothing newer? There is a general impression that Forest recreational use has rocketed in / post-Covid; especially given the well-documented dog-explosion. Further, subjective evidence from our members who live near Forest entry points suggest there has been no falling off of visitors now Covid is reduced.
47	B – “will not be permitted”; ought to be echoed by toughening up M44.
47	To monitor / survey particularly the origin of visitors – the equipment being used to levy car par charges might be utilised as CCTV / ANPR data-gatherers.
47	Fly-tipping – odd to see this bracketed with recreational uses. Almost weekly local papers report on increase of gross examples of fly-tipping; EFDC (with Forest Conservators & Essex CC) need increased focus here. Consider providing more Civic Amenity points, the friction of distance must be a factor, presently our nearest is the far side of Harlow – hardly sustainable. Or greater enforcement. Set a deadline for clear-up after reporting?
47	Footnote 2 – if the Forest is recognised as so special, why not indeed have a no-build buffer? Or at least add “which must demonstrate exceptional circumstances”?
52	Last part – access to PRowS is statutory; EFDC must ensure access to these, even if sadly it leads to increased pressure on EFSAC. We are concerned that there is a hint here that Council may be giving itself authority to meddle with public footpaths etc.
56	Epping Society are concerned that policy is neither sufficiently clear to the Planning Committee East or else there is too much subjective judgement allowed. A recent planning application was approved for a three storey Victorian style, double fronted house with two full height bays, yellow bricks and slate roof. This is to replace one of a row of fifteen neo-Georgian two storey houses with pantile roofs. The planning officer and committee considered the replacement house to be similar to what it would replace, which we find it impossible to reconcile with the stated intention to have design in keeping with the place. Similarly, Qualis, a wholly owned subsidiary of EFDC, has made a series of planning applications which include architectural design

	wholly out with the designs found in Epping.
56	To the extent that paragraph H(i) is reflected in existing policies or to be taken into account as emerging policy, we call for greater clarity as the planning case referred to above did not appear to meet the “sunlight, daylight and open aspects” mentioned in the policy, yet the case was approved.
56	The Quality Review Panel conducts its affairs in secret and no local resident is part of the panel. It is restricted to developments of over 50 homes which means important sites of one or a few new houses is subject to no design review at all. We again call for the QRP to be open, public and transparent in its handling of business and for significant sites even of a single building to be self-referred. We call on the QRP to give opinions on controversial planning cases where design was at issue so the planning officers can be better informed what acceptable local design is intended to be.
56	We also call for greater respect to be shown to the views of Statutory Consultees, local amenity societies and members of the public when they conflict with the views of planning officers or Councillors
57	The word “should” ought to be made more certain as otherwise we envisage planning officers and committee will use the implied discretion to routinely grant permission for applications that fail to provide amenity space. The sentences which have been deleted from Part E and moved to DM9 should be reviewed also in respect of new buildings among existing development so as to avoid inappropriate design and materials.
61	We welcome the addition to Part A (ii) which we argued for at the Hearings. However, we seek stronger language - short of imposing an obligation to alter existing shop fronts. We again call for a design guide similar in character to those published by other local authorities such as Shop Front Design Supplementary Planning Document adopted March 2016 in the London Borough of Waltham Forest
63?	Would this be a place to insert / reinforce Council policy & their Building Regulations to make the use of permeable ground surfaces mandatory? We think of many recent developments permitted that have avoided that expectation, e.g. front driveways and a block of flats.. This problem has increased as Council imposes Controlled Parking Zones across the District. Many other Districts we have visited would appear to have made this permeability requirement compulsory
67	Why not take the aspiration step of requiring Grey-water systems for all new developments? It is not expensive to install in new homes; and should pay back owners in water bills quickly. It is not so with retro-fit.
69	Why not simply impose Building Research Establishment Environmental Assessments Method on all new builds through Building Control?
71/2	District heating schemes should be at least considered for all new developments of above a certain number, especially where blocks of flats are proposed.
74	See AQMA points made in MM40. We are not satisfied that “taken into account” is a sufficiently strong policy wording and appears to leave open the possibility of approval for damaging development proposals.

	<p>Can 4.158 be amended to state how often the “regularly” will apply and how promptly the results will be published. A five-year survey published a decade later would satisfy the policy as written. Similarly, we regard the policy as too flexible in that the timing of action under an AQAP is not stated; in the case of Bell Common this has been a problem for more than a decade and action has been minimal.</p> <p>New paragraphs following 4.163 (APMS) does not make clear what is the base date for computing any net increase in traffic, which we believe should be rectified.</p> <p>According to our search of the EFDC documents available on its web site (on Monday 20 September 2021) it appears the Council’s Local List of Validation Requirements” was not complete. It would be inappropriate to confirm the Local Plan before this document is available in a complete form.</p>
76	<p>Is the proposal to “support Neighbourhood Plans” a repetition of the existing obligation or does it imply a level of involvement by EFDC which might be seen to detract from the community basis which NPs are intended to have?</p>
77	<p>B. There is no clarity on the delivery of mitigation funded through contributions <u>before</u> the respective development is occupied and this should be resolved.</p> <p>C Protection of the EFSAC and other AQMA issues should be resolved using measured data not “models” .</p> <p>EFDC should publish and maintain up to date online a sufficiently large scale map or plan to show areas in which these policies apply to development. This would avoid needless expense by potential developers.</p> <p>We expressed the view at the hearings, which we repeat, that very small developments would be unable to fund or resource the reports called for so a minimum size should be specified for exclusion from the policy.</p>
78	<p>EPP.R4 (St Johns Road) is now categorised as “mixed use’ yet the wholly owned subsidiary of EFDC (Qualis) has made an application which is wholly residential, nearly all small rented flats – definitely not “mixed” in any way. Please can the position be clarified.</p> <p>We are not clear how to reconcile a policy for 34 homes with an application by a subsidiary of EFDC (Qualis) for a multiple of that number. Can “and appropriate uses” please be made more clear? Is this meant to refer to ancillary activities (such as car parking) or is it intended to include commercial., employment or other non-residential uses.</p> <p>MM has St John’s Road site at 34; but the recent Qualis application is for just under 200. Either LP must be amended or Qualis application refused point blank. How can a Council publish this ED 130, but allow their wholly owned subsidiary to plan for such widely contradictory numbers?</p> <p>If Council/Qualis really intend 200 on St John’s Road, that should impact on the numbers of homes needed elsewhere? and reduce the Green Belt “take”.</p> <p>The policy “Sustainable Transport Choices” seems to us inappropriate given that the Local Plan reassigns existing employment sites to residential and permitted</p>

	<p>development of offices in the town has and appears likely to further reduce the opportunity for employment here. As the only viable non-car transport available from Epping is the TfL Central Line south, the employment opportunities would be severely limited by this policy. Access to EFDC sponsored Employment sites shown in the Local Plan is not viable other than by motor car.</p> <p>We do not understand the reasoning for taking EPP.R3 out of the plan. We believe additional car parking is needed at the station, much better access for buses, taxis, bicycles and pedestrians could be provided if a second floor of parking were to be provided so part of the ground could be used for improved access. We believe flats could be built to a modest level above such a structure without causing overlooking problems and accordingly this large open space nearer to facilities than Epping South, should not be withdrawn but modified.</p> <p>The amended part D seems to give EFDC the ability, in discussion with developers, but not necessarily with public consultation, to delete limit or modify infrastructure which is needed to support developments and accordingly we oppose it strongly.</p> <p>In the new section Parts D and Part E (leisure centre): please can the wording be updated to make clear that the range of activities in the new centre will be no less than in the existing one but with the addition of a full sized swimming pool. This “equivalent” was repeatedly promised during the Hearings and emphasised by the Inspector. This commitment is re-stated here again in MM119.</p> <p>We are astonished that a recent plan offered by Qualis breaches that agreement. Even assuming that this is an error, there has already been a significant impact on public opinion; talk of people “not keeping their word”.</p>
78	<p>South Epping – housing now down to 450; but we note that other documents in the same pack have differing figures e.g. EB1421 (in Supporting Documents, L) has 735-829, less possible school adjustment.</p> <p>Documents should have been scrutinised for internal consistency prior to release – it gives such a poor impression.</p>
78	<p>With that reduction goes – no hub, shops, retail, GP, no car pool – various sweeteners offered at early stages. No vehicle bridge, less bus provision</p>
78	<p>Part D – lists “specified elements”, but only some are “enhanced” or “improved”; why not all?</p>
78	<p>K(iii), School – why not “with early years provision”; the schools intended for North Weald and Ongar have this provision?</p> <p>The deletion of reference to Ivy Chimneys School needs explaining. When last spoken to, the Headteacher of that school was in despair over the uncertainty; saying they have a 5-year budget to plan for.</p> <p>We would oppose any replacement of the existing Ivy Chimney school and instead favour its expansion. If it were to be replaced by a new facility, we ask that policy makes it clear the existing site cannot be converted to housing as it was formerly Green Belt land. EFDC has a history of building new schools on the margins of the town on Green Belt land and later using vacated land for high priced housing.</p> <p>Reference should also be made to a July 2021 letter from Essex CC about school places (part of a recent Qualis planning application) – indicating that around £1M</p>

	ould be needed to create addition places due to the proposed developments.
78	No specific health provision; see MM16
78	No car pool or visitor parking or disabled parking !
78	SOUTH EPPING WILL NOT BE A COMMUNITY AS PROMISED; JUST TWO SOUL-LESS HOUSING ESTATES, FAR FROM HIGH STREET, LEISURE,& SCHOOLS.
EB1421	Bund at motorway. 7m earth plus 3m fence, that is almost 33 feet! We don't think the cross-sections show a true representation of this. Further, this bank will be to the South & West of the housing, on top of rising ground – but there is no mention of the huge shadow this will cast, especially evenings & winter. That has to be assessed – with a likely impact on house saleability & price. Such an obstacle will also impair views across local countryside, including the Essex Way.
EB1421	Map – route of fuel pipeline not shown.
EB1421	Map – appears to show the loss of a playing field, used by many local community groups / individuals; despite mounting evidence of the value of such areas.
EB1421	4.3 “the (foot)bridge will give access to community facilities” – what are they to be?
EB1421	4.6 “no strategic benefits of bridge” – what about the opportunity for vehicles to have several access/entry points to the estates; in case of traffic congestion, floods, emergencies; or simply to minimise drive time/distance. The example of Church Langley in Harlow can be cited as what goes wrong when an estate has only one access. During the Hearings, we were told that a bridge was “essential for emergency vehicles and public safety. If there is no strategic advantage in a bridge, why was it proposed so strongly in the first place? We believe that a Local Plan should not be a place for verbal play-acting or face-saving.
EB1421	A site visit to the bridge has shown that the approach slopes on both sides are damaged / eroded. Considerable work will be needed to render this accessible to cycles, less-mobile, folks with prams etc. We see no mention of this in the document.
EB1421	The Eastern part does have 2 access points, but one is on quite a dangerous junction at the bottom of the steep hill, on a nearly blind bend; the other a very restricted site close to railway bridge. Neither good, although there may be a small benefit to traffic in Bridge Road; have residents in those specific areas been consulted about this high-level proposal?
EB1421	Western half only has one link – see 4.6
EB1421	4.7 last version had several sustainable transport measures, mostly gone. All now fails the tests set in MM17, if that Modification is accepted, then South Epping should be re-reviewed.
EB1421	4.8 public transport links reduced; whether sustainable development? See MM17 etc
EB1421	4.9 the repeated false assertion that station and particularly town are convenient to walk & cycle; although we are pleased to see at last a recognition that cycling up to town might be challenging!
EB1421	6. Flooding; yes indeed – Brook Road!
105	Current practice appears to keep viability assessments out the public gaze, so any relaxation of infrastructure obligations of developers by EFDC would not be subject to review by voters or even the full Council. Accordingly, we call for open assessments, or else the publication of key metrics used by EFDC to determine viability and the publication of values achieved by applications. It is not clear who will be responsible for investigating any revised viability at the end of the project – is

	<p>it up to the developer to voluntarily do this or will EFDC have recording and control procedures to monitor the position.</p> <p>Given the limited financial skills available within EFDC how will it appraise the viability assessment?. The use of third-party consultants who also produce such assessments for developers is not an acceptable solution because of potential conflicts of interest.</p> <p>It is not clear that infrastructure will be available before the properties are occupied and that should be made clear and explicit beyond doubt.</p>
107	<p>In 6.23 we would like this amended to include the development and extension of existing education facilities. It is written with a presumption of building new (please see out point on demolition impact).</p> <p>We welcome the reference to accessibility but we fear yet another peripheral school as has been built twice in the recent past (with the former school site used for housing). This has resulted in increased motor travel, danger to pupils crossing roads and the loss of local support and empathy for the former school in its earlier setting.</p>
108	<p>“Accessibility” in this policy and MM107 should accommodate the Local Plan’s policy on modal shift so it must be accessible on foot or by bicycle by residents actually likely to use the facility referred to. Nation recommended time / distance parameters should be used, modified in the light of terrain and road factors.</p>
111	<p>Monitoring is not effective unless it is conducted regularly and the results are published promptly. These aspects appear to be absent from the policy and accordingly we ask for an amendment.</p>
112	<p>We are disappointed there is no stated provision for public consultation in these plans for reviewing and updating the LP in subsequent editions. Perhaps this is an oversight?</p>