



Please reply to:



Epping Forest DC
FMM Consultation 2022
Planning Policy
Epping Forest District Council
Civic Offices 323 High Street
Epping
Essex CM16 4BZ

7 December 2022

Dear Inspector Bore

EFDC Local Plan 2017

Appendix setting out our response Main Modifications Autumn 2022

The Planning Committee of The Epping Society have carefully considered the further Main Modifications and submit the following comments to the Consultation. Please refer to the attached Appendix in addition to this letter.

General responses and for emphasis

Consultation process :

- The principal document is very large at nearly 300 pages, plus various supplements.
- To issue it as one pdf has made it quite unwieldy, eg we found we could not edit out the non-red parts. Were alternatives considered?
- ED145 is highly technical, and with many acronyms not explained in the Glossary, it is a daunting prospect to embark upon especially for lay people.
- While theoretically accessible to all, the Consultation depends on respondents having considerable background knowledge and being able to commit a great amount of time and concentration. This will have deterred many of the general public from participating. We wonder if alternative formats were considered for communicating the MMs and for the Consultation.
- Further documents (ED144A, ED144A.1) have been issued subsequent to ED145 giving further information and maps. It is not clear if this is part of the Consultation which we believe it should be, since it has information not in the main bundle, eg additions to the maps in ED147A. Yet ED144A is not listed on the Statutory Regulation 35 Notification. ED144A has been issued during the Consultation period so the public will not have had the full amount of time to consider it as was set out initially. Are there to be further documents yet to be issued with an even shorter time to respond?

General principles for Objection:

- “Watering-down” – there is a large number of proposed changes which reduce the Council’s ability to ensure that sound and sensitive developments take place. As one of a great many examples, MM16 is shifted from “require” to “have regard to”. We argue that Planners and developers will find this subjective and ineffective; we feel it will make it easier for poorly-policed, inappropriate developments to be built. Others such as MM41 undermine Council intent and policies to reach Net Zero Carbon in the time frame they have proposed.

In this regard we draw attention to a statement on 14 November 2022 at the Centre for Policy Studies by Michael Gove (Secretary of State for Levelling Up, Housing and Communities and Minister for Intergovernmental Relations) in which he promised to make it more difficult for developers to "wriggle out of their responsibilities" on infrastructure. It would be unfortunate if a lack of certainty in the EFDC Local Plan meant developers could indeed "wriggle out of their responsibilities" on infrastructure.

- “Washing-over” – eg MM209. Council and Planners went to great lengths to select sites, using consultants such as ARUP; and this process has been publicly consulted upon, and carefully tested in public hearings. Now at a stroke, some sites are to be deleted, and the Green Belt restored. But other sites were subject to the very same process, and despite being Green Belt, they are to be developed. No clear rationale is given for these decisions which appear arbitrary. We are concerned that some parties will claim this violates statutory and / or moral principles.
- Redundancy – a number of matters referred to are outdated. Examples include MM21 (motorway junction), the EU in MM74, data from 2013 in MM71, while housing trajectories are based on 2022 whereas it will be 2023 before this Plan is Adopted. This Local Plan process has been so protracted that we argue that many of the premises and data it is built upon are now no longer relevant. Some Councils have gone for a “refresh” or even starting from scratch.
- There is also a lack of clarity in MM111 and MM46 about how reviews (other than 5-yearly) might be triggered, relying vaguely on “other matters”.
- Inconsistency – ED145 contains a number of internal contradictions, which can only suggest haste / inadequate scrutiny. Just some examples include the housing number for Epping South (MM77 and MM78), and primary schooling in that area (MM78 and MM109). These cannot endure in a legally coherent Local Plan – as a matter of Soundness
- There is serious confusion about the philosophical basis around “need for housing”. Councillors repeatedly tell us that new homes are needed for local people. Yet a Qualis document for St John’s Road is explicit about a “new, vibrant demographic”. Meanwhile MM47 states that “needs do not have to be identified”, but MM111 has a bullet-point about “local housing need”, while the report of ONS which informs housing need was not taken into account by EFDC (National Planning Policy Framework NC21, tabled by Theresa Villiers MP <https://www.local.gov.uk/parliament/briefings-and-responses/levelling-and-regeneration-bill-remaining-stages-house-commons>). To our knowledge Council have never sampled local opinions on this crucial matter.

In view of the significance of all MMs including this latest batch, we feel uncomfortable that endorsement of them by the full Council seems not to have been given. We are concerned there is no democratic process and councillors will be presented with a *faite accomplis* when the inspection has been passed.

Finally, we draw attention to a recent letter¹ from Michael Gove on 5 December 2022 in which he sets out his intention to change the way housing numbers are arrived at and clarify that “local planning authorities are not expected to review the Green Belt to deliver housing”.

Yours faithfully

Andrew Smith

Co-Chairman

Planning Sub-committee

The Epping Society

Enc

¹ [https://mcusercontent.com/3036c690a1180c4edb90ae1a0/files/6d2b9179-a5d5-2d7d-07ab-db0d0264c3b4/22125 Michael Gove MP to all Conservative MPs.pdf](https://mcusercontent.com/3036c690a1180c4edb90ae1a0/files/6d2b9179-a5d5-2d7d-07ab-db0d0264c3b4/22125_Michael_Gove_MP_to_all_Conservative_MPs.pdf)

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)

2. Personal Details

3. Agent's Details (if applicable)

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EFDC Local Plan 2017

Appendix setting out our response Main Modifications Autumn 2022

Specific responses - A structured response in the same format as Council document:

Page	MM	Notes
30	13	<p>The need for additional employment land has not been adequately justified to take into account the increase in home working. The need for additional homes in the district was justified on the basis of demand but the proposal for additional employment land suggests the demand is not from within the area as implied.</p> <p>Furthermore, if there is a need for additional employment land it shows the folly of “allocating” existing employment land close to residential for redevelopment as housing land (EPP.R9). New employment land is bound to be more distant from housing and established transport hubs so the EFDC policy of reducing road transport will be negated thereby.</p> <p>Existing policy of Permitted Development to convert offices and other employment buildings to residential undermines the EFDC policy and could lead to inappropriate locations or building styles for residential development.</p>
18/9	15	<p>Removes the sequential approach to site choice. States that this is somewhere else, “part D” – but we can’t find it.</p> <p>A sequential approach carries with it clear priorities, and it is accountable. Removing it invites a free-for-all, each case on it’s merits – not really a Planned approach. Such subjective approaches lead to a lack of confidence among residents in the fairness or consistency of decisions while potential developers face added uncertainty.</p>

20/1		<p>The housing trajectory for Epping town is halved (which will be welcomed by many residents) but we remain concerned about a lack of clarity in respect of Epping South (see MM77 and ED144A below).</p> <p>Policy on parking and enforcement within and near employment areas should be added to the policy to avoid destruction of verges and vegetation and obstructions from parked vehicles.</p> <p>The intrusive ugliness of the lorry park adjacent to M25 J26 shows the need for screening employment areas.</p> <p>We note remarks by Michael Gove MP, Secretary of State for Levelling Up, Housing and Communities who stated that Councils should use the most recent ONS data when assessing housing requirements but this seems not to have been taken into account by EFDC.</p>
22	16	<p>One of several watering downs : “require” becomes “have regard to “ which developers may view as toothless; Council will be unable to enforce while the public will be dissatisfied.</p> <p>The Local Plan should make clear which policies refer to larger housing estates and which apply also to single dwellings or small scale developments. Even extensions might be thought to constitute “development”. The list of matters to be “ensure[d]” by “Development” would not be realistic other than for well financed housing estate developers.</p> <p>Are these requirements also intended only for Strategic Masterplan Areas; it is not clear.</p> <p>It is noted in ED144A that Strategic Masterplans and Concept Framework Plans are to be prepared by developers/owners and merely endorsed by the planners. This is weak and provides opportunities for key issues to be omitted. How wide will the consultation be on these plans. EFDC Concept Framework Briefing Note of September 2018 appears to state that they are quite different from Masterplans but we are not aware the hierarchy has been defined or the public consultation procedures specified.</p>
23	16	<p>What is a Concept Framework, and who is responsible for producing it – Council or developer?</p> <p>We are not clear and we suspect the public also remain confused about “Concept Framework Plans” and “Concept Framework Plan Areas”. In some policies these terms appear to relate to allocated development sites and the Masterplan developments required. For the avoidance of doubt we seek clarification of the terms and confirmation that both “Concept Framework Plans”, Strategic Masterplans and Masterplans will be consulted upon with the public and Statutory Consultees in a formal way.</p>
26	17	<p>“have regard to” again we find this subjective and unsatisfactory for that reason in this case and the many others noted below.</p>
28	18	<p>Harlow: the principle of sustainable transport is endorsed, yet Sustainable Transport Corridor is now only “sought” not required.</p>
28/9	19	<p>Harlow Masterplan (Gibbard) was to be “adhere(d) to “, yet is now only “have regard to”.</p>
29	19	<p>Heritage assets and their settings added, good</p>

30	19	Here sustainable transport is a “prerequisite”, and “upkeep required” - good (but see MM18)
32/3	21	Developments “must serve / support infrastructure” - good
33	21	Sustainable Transport Corridor in this MM must be “safeguarded” - good (but see MM18)
39	21	Reads as if M11 J7a is still in progress whereas it is operational; is this MM then redundant or at least out of date.
46	27	Now includes “older people” – some improvement. See our observations on MM16 in relation to proposed small developments and extensions.
47		Housing “needs do not have to be identified”; but that means that demonstrable needs can be ignored; also encourages speculative development irrelevant to local market needs. There is already a major concern in this area, in that EFDC rejected the Office for National Statistics’ huge reduction in their evaluation of housing need. Gives EFDC freedom to be far too creative with number of homes “needed”. See also MM15 and Michael Gove’s remarks.
65	34	Addition of more employment land appears to us to undermine the justification for making the Epping Laundry (EPP.R9) a housing site.
56/7	36	Removal of vitality & viability test makes retail support more definite and we remain against town centre ground floor residential uses.
58	36	How might “no demand” ever be demonstrated. Could we have some criteria please.
61	37	Farm worker accommodation – unclear if Biv is enforceable (such as removal when no longer needed). We would like better controls to stop these homes later entering the open market?
	38	A clearer statement on energy production / pollution is welcomed
62	40	Bell Common Air Quality Management Area remains a focus of concern but still there has been no action from Councils although it is a statutory matter. Proposed development at Epping South will further impact this problem. The very low density of development of Harlow (a partner in the SHMA) emphasises our view that building on the Green Belt is not justified.

65	41	<p>The removal of Electric Vehicle charging points provision as a Residential requirement is regretted. As petrol and diesel cars are soon to be phased out, according to the government, how will even essential car users operate. We consider that every new parking space should have access to charging. Otherwise we offer a disincentive to residents trying to shift their behaviour in the direction policy requires.</p> <p>Under this MM, points would need to be retro-fitted which would be much more expensive, perhaps unviable and at whose expense is not stated.</p> <p>Lots more EV cars in the District with poor charging access will result in chaos which the local plan should seek to avoid.</p> <p>This change runs hugely counter to EFDC Climate Crisis Action Plan so we question if this LP version been cross-referenced to that.</p>
66	43	Safeguards Sustainable Transport Corridors, again welcomed.
68	46	The Forest was established by Charter [Epping Forest Act 1878] explicitly for recreation; that should be acknowledged here. Conservation is important but not exclusively so. The Forest is a resource and a benefit, not principally a problem. This is about attitude / tone. It is one of the main reasons people chose to move to the District; which has already been restricted by parking charges within the Forest
70	46	<p>We have seen no data to support the statement about what drives visitor numbers in the forest. Anecdotally there has been a substantial increase in visitor numbers over the past two years when housing completions in EFDC has not been large.</p> <p>Para 4.18 needs future-proofing. Recent events (climate change, Covid, demographics, commuting patterns, dog ownership) appear to be significant drivers of visitor numbers and further changes in these metrics may be important. Certain of these issues have shifted substantially since the original Local Plan was drafted so we propose EFDC should review the starting point of the Plan, as well as (here) trying to future-proof.</p>
71+		It is a significant part of the Local Plan strategy to achieve “modal Shift” in order to mitigate increases in traffic for highways and pollutant and CO2 reasons. The hoped-for rise in cycling has been patchy across the district and minimal in our “parish” [Epping Parish]. We accept that new developments may be probably the primary driver for such changes in travel habits but we feel this policy is far too sanguine about the likelihood and timing of any material benefit from modal shift.
72	46	<p>No reference is made to particulates, with their now proven health impacts and which are not being evaluated nor mitigated. The Epping Society point out that even Electric Vehicles create this form of pollution so to ignore particulates suggests that the Plan is just a paper exercise rather than a real-world analysis of a critical situation.</p> <p>The last sentence at top, “forecast to be an increase in pollutants of concerns” – assuming that this is a true analysis, the obvious logical solution is to severely restrict all new developments.</p>

		There has been no recent air quality monitoring in Coopersale woods; but these contain both NNR & SSSI areas. The woods are just over the M11 from North Weald airfield, scheduled for large growth. We feel this needs critical & urgent attention.
73		The new paragraph 4.20 is not qualified so it appears to apply to every planning application. We submit the requirements should not be imposed on house extensions, small developments (either residential or commercial) nor on developments of single or small numbers of houses. The policy (as with several others) appears to have large housing estates in mind whereas the bulk of planning applications are for small matters.
74		Refers to the Air Pollution Management Strategy; again, see previous note. Can be characterised as “applying a sticking plaster to a self-induced injury”. Reference to Clean Air Zone in the Forest; this is political dynamite, which Council have tried to blur on several occasions and so it is unsound. Consider the inconsistency – to avoid a CAZ, we need more EVs, for which we need more charging points. yet see MM41! Our suggestion is that limiting charging points is a deliberate and cynical push in the direction of modal shift; if so, this should be explicit. It would also make the attainment of global shift even more critical and regular progress reports ought to be specified in the Local Plan. The last discussion of the Clean Air Zone we have seen involved charging buses, which runs counter to modal shift. It is necessary to remind Council that a CAZ would not be implemented by, nor would directly fund the District Council as County Council & Epping Forest would be the agents here; can a DC Local Plan commit third-party agents to these actions? At least there should be a statement of common ground from each of them.
75		Zone of Influence and Suitable Alternative Natural Green Spaces – all good; but they are mitigation which would not be necessary if developments were being planned in the right places. We think it should say “ <u>nor</u> existing residents” and so the editing was in error.
76/7	47	Good; strictness that developers “must” mitigate, individually & cumulatively but see our remarks in MM22 for small developments and extensions.
85	56	Overheating – ED29 is not specific. Note that ED29 and Climate Action Plan have several other provisions. Council will only need to “have regard” to this which is a weakening of control. Unfortunately even with the present policies, there is no known track record of EFDC diligence in this area.
87	60	“meets” has become “taking into account”; weakening which we feel is not appropriate.
93	71	“Demonstrates & enshrines” represents a low ambition by EFDC.
94		2013 is ancient data, redundant – the situation is likely to have shifted. If there is nothing more current and valid then this is unsound.

		District heating schemes out; generally good – although they might still have currency in very high-density developments, in future with new technologies (eg Air or Ground Source Heat Pumps); perhaps more flexible phrases might be used?
95/6		Good attempts at future-proofing
97	74	Reference to the European Union is irrelevant; also the grammar is unclear.
98		Air Quality Management Area again – see MM40; but we would again remind the Inspector that there has been no enforcement. Clear legal obligation, but no action; but they were “required to reduce levels by 2020” and have not. EFDC are not always rigorous at meeting obligations; this is part of the reasoning behind our concern about some the weaker commitments being made in these further MMs.
99	74	“Required” would be better than “important”
Ch.4	-	Nothing about the environmental impacts of demolition, which is currently an emerging concern. It is understood that some Councils require proof that redevelopment is not a viable option.
103	77	<p>Site EPP.R2 Confusion over number of homes for Epping South – here “maximum of 450”, but see MM78 K(i) which refers to a minimum of 450. There is also confusion about site EPP.R1 and whether it is to be part of the “450” houses for Epping South.</p> <p>Good to see 2 barriers set out; but there are other constraints – why are they not mentioned?</p> <p>It would assist the public if the housing density on this site was made known. This is for town planning judgement and also to satisfy the public that the loss of so much Green Belt is justified by the numbers of homes to be provided.</p> <p>During the course of hearings the developer involved with the proposed estates of Epping South stated that a noise reduction bund of considerable height but such a structure is not shown on the plan.</p> <p>It is not clear to us from the plans and the narrative of the MMs whether SANGS for Epping South EPP.R1 (if still in the plan as a development site) and EPP.R2 are to be located within the Developable Areas shown. If not we seek clarification whether additional Green Belt will be used for these and if so, would the land become “previously developed” land if it was no longer used for SANGS.</p> <p>It is not clear to us why the “Indicative Green Belt Boundary on the plans in ED144A.1 is so far from the Developable Areas. Why is it proposed to take Green Belt Land here without showing very special circumstances.</p>

104	77	<p>We do not consider the changes made in response to the Inspector's actions list are at all satisfactory.</p> <p>The Site Constraints plan in ED144A does not delineate R1 but only shows the northern boundary along the rear gardens of homes on Bridge Hill and Ivy Chimney Road. If the Local Plan is to facilitate development of this area it must be properly shown on the map. The boundary enters into the Central Line Noise Buffer as does R2 which does not seem to have an eastern boundary.</p> <p>As modified the number of houses on the two sites EPP.R1 and EPP.R2 is specified as 450 but provision is made for the number to increase. For all the reasons we advanced at the time of the hearings, we consider this site to be a poor one on most grounds and Inspector Phillip seemed to concur.</p> <p>Among the shortcomings of this site is the impracticality of the EFDC policy of Modal Shift. Inspector Bore is invited to cycle into town, or push a loaded pram up Bower Hill and Station Road after first cycling or walking down the hill from the furthest extent of the estate. It seemed unlikely an adequate public transport link eg a bus service would be viable and with 450 houses that seems assured.</p>
104	77	<p>Access to the sites does not seem to have been satisfactorily resolved. At the hearings it was stated that a road traffic and foot bridge would be needed to connect R1 with R2 but the developer involved stated the cost of it could not be supported by the proposed housing numbers (then "950+"). The current plans show the areas R1 and R2 separated by the Central Line. No access to surrounding roads is shown for either of them and we draw attention to the fact area R1 is enclosed by the M25, Central Line, "Area of Landscape sensitivity" and a row of long established houses. The only access from it to Bridge Hill appears to be two narrow strips of land which are poorly located onto an already busy road close to a narrow bridge.</p> <p>Residents will be sorely disappointed EFDC still aspires to 950+ houses and we invite the Inspector to cap the numbers before approving the Local Plan.</p> <p>References to Masterplans appear confused. The amended Paragraph 5.16 calls for planning applications to be accompanied by a Masterplan. We recommend that Masterplans here and throughout the district should be prepared, considered and approved, following public consultation run in accordance with Statutory requirements, before any planning application is submitted. We consider the public and EFDC planning staff will be seriously disadvantaged if these are combined because of the volume of work needed to address them and the pressure we anticipate from the council and developers.</p> <p>The aspirations for developer support of required infrastructure are weak and the decision making around this is subjective and unreliable.</p> <p>We ask Inspector Bore to reflect on scepticism among the public locally as to the objectivity and effectiveness of the local planning process.</p>

105	78	450 is here a “minimum” – see above. We believe the Local Plan should be specific, especially after such a long gestation period. Number of homes at Sports Centre could be read as “2”- a typo Amend part D: this is a very vague policy requirement which is unsatisfactory to residents and developers alike.
106		Developers “must” contribute; with list of requirements; good. The question then arises – how to enforce / overcome arguments about viability eg part D – is a new primary school to be demanded; the community and the school and Essex CC at the time of the Hearings preferred to expand the existing school. We ask for confirmation that any new or additional school south of Brook Road and Ivy Chimney would be within any land taken from the Green Belt and not additional to it.
106		Also refers to road access “not hindering existing”. We simply cannot see how this might be realistically achieved for this site. For much of the day Ivy Chimneys Road is already beyond perceptual capacity. Please see traffic data for the relevant roads; or carry out an Inspector’s site visit. We do not believe it is satisfactory to leave site access until any Masterplan , consultation upon which is likely to be short and on current policy drafting coincidental with a large planning application. It is not reasonable to expect the public to be able to deal with these within a short consultation period. Further, what proportion of new traffic will head for the Bell Common Air Quality Management Area? Has this been modelled?
108		Part G waters down air quality and the Special Area of Conservation – “have regard to” again. Yet developers “must demonstrate no significant impact on air quality in the SAC” (or similar wording) This is inconsistent.
109		Part kii – “new primary school” is stated here – see above. The Plan must be consistent, lest we have endless arguments about what has been approved. The community and the school and Essex CC at the time of the Hearings preferred to expand the existing school
110		Introduces a “build to” line.... This needs to be much clearer on map! We notice that this line / very similar is “defensible boundary” in ED144A. Could we have clarity & definition of terminology please Beyond this line is designated for...open space or other “appropriate uses” – such as? Who is to decide? Are we looking at a grey area where Planning Blight can set in?
111		Masterplan to be publicly consulted – good but it should be done and approved before a planning application of the site.
125	202	We consider the protection proposed in relation to developments addressed under this MM should apply to all development and not only at this location, important though this is.
165	98	Coopersale. Part G – again, “have regard to” this is meaningless and implies no public scrutiny.
176	106	Reinforces the demand on developers for infrastructure - good. We would like the Inspector to bear in mind that most aspects of the District’s infrastructure are already beyond their nominal capacity. Unless the Council has the mechanisms to insist on mitigation, the outcome will be dire.

182	109	<p>Changes delivery of utilities from “prior” to “at the right time”. This is very vague, and who is to determine this “right time”? Perhaps this can be explicit, eg “before the first home is occupied” which is a concept being considered for legislation currently before Parliament.</p> <p>We draw attention to The Levelling Up and Regeneration Bill which introduces a new Infrastructure Levy which would be due at the point of the occupation. While this is beneficial to developers, it does not help local authorities ensure infrastructure first as a key pillar of place-making. Accordingly we believe the Local Plan should be more explicit as to timing to ensure that in EFDC area at least, it is delivered when required.</p>
183	111	<p>Local Plan Reviews, now includes “consideration of wider factors”. This is probably deliberately open; but might be a window for inaction – how significant must wider factors be? Who decides? Is there to be a community input and if not, why? Many feel the present Local Plan already fails to take account of a number of existing “other factors” and should therefore be subject to a major review as it stands – see points above</p>
185/6		<p>A bullet-point refers to “local housing need”, but see MM27 – but Council are already ignoring local need, as assessed by the Office for National Statistics. Further we sense there is widespread local opinion against one-bed flats e g Town Council objections to the Qualis development in St John’s Road, and recently (November 2022) at the Travis Perkins site (EPF/0028/22); yet most imminent developments are for exactly those. Local need is being ignored at present, how will ED145 resolve this for the future?</p> <p>May we suggest the Inspector visits any local café for lunch, and does a vox-pop exercise about one-bedroom flats.</p>
Gloss		<p>Now includes “cared for” housing -good</p>
App6	208/9	<p>Removes RUR.R1 - very good indeed but the grounds for it should be clarified and the fact made consistent with other policies (see our remarks above).</p>

ED144A.1

Revised Appendices to Council’s response to Inspector’s note and appendix ED141 (inclusion of additional correspondence from engagement with site promoters of Latton Priory Strategic masterplan Area (SP5.1 in appendix B) published 11 November 2022

In relation to the EFDC evidence to support the housing trajectory we have the following observations:

1. Not all developers have given support for the adopted trajectory. For example, we could not find any evidence that Qualis (the EFDC wholly owned developer) had done so although its housing numbers are material, especially in Epping. The numbers of housing units forecast for delivery in 2022/23 and 2023/24 do not appear likely given the current state of work on the sites.
2. Developers' support was not unqualified and they were full of caveats.
3. In one specific case, their support for the EFDC housing trajectory was based on a Gantt chart which is already out of date.
4. In relation to SP5.2 (Water Lane), the following weak statement is not sufficient evidence to support the inclusion of those homes in the trajectory: "Council provided a trajectory for site for comment" according to an email of 29 July 2022. This does not amount to a worked plan nor does it suggest any form of promoter buy-in.
5. Homebuilding & Renovating magazine reported on September 08, 2022 "Price of materials rises 24% in 12 months. The construction materials shortage is improving but soaring prices and labour shortages could affect your project" while other reports point to a shortage of labour and much higher labour costs, partly driven by increased retirements from the industry during the Covid scare. Eye on Housing 2019 "The share of workers ages 55 and older was 21.7% in construction, implying that a substantial portion of workforce would retire in near future."

We feel that up to date and complete support for all material housing estates included in the Local Plan housing trajectory should be submitted before it is judged to be sound. We feel the rapid increase in delivery shown on the EFDC chart is so acute as to require convincing evidence it can be delivered. From just over 200 completions in 2022/23 EFDC projects 1,000 completions in 2025/26 and 1200 the following year. EFDC planning department has never handled that volume of house building before.

We seek clarity on the status of EPP.R1. It has no defensible boundaries and no reasonable means of access (see map in ED144A.1 and dated "September 2019"). If both EPP.R1 and EPP.R2 are to be used for the 450 houses what is the development density and how will vehicular movement be achieved between them. Further, there appears to be confusion over map references (ED144A.1 or ED144A).

ED146, MM78 – Epping South maps: where is the big fuel line? This is only presented in ED144A – after Consultation had opened. Inspector Phillips walked the site and reported that much of the area was too steep, why has this not been fully taken into account? It would have been nice to see Public Rights of Way shown more clearly here too, we believe these need careful protection. The "build to" line in ED145 is barely visible against fence and trees – needs bolder colouring (see p.110) ED144A map has an area shaded as "Landscape Sensitivity" – this is not mentioned in other places – what does it mean, and what are the planning implications?

Importantly EPP.R1 cannot remain in the plan as it is not an enclosed area but only a line along the back gardens of houses in Ivy Chimney and Bridge Hill; also applies to ED144A. (MM77 shows EPP.R1 is still in the LP - "Planning applications for sites EPP.R1 and EPP.R2 have together been identified as a location where development should be accompanied by brought forward in accordance with a Strategic Masterplan). Notes relating to EPP.R1 and R2 continue to refer to "remaining capacity" for an additional 439 homes on the site(s) of Epping South whereas the Inspector has already determined the "950 plus" homes there is not achievable and must be revised. There appears to be no justification why 450 homes can be supported on the sites.

ED174A, not referenced to an MM, **but this is a change to the existing Plan.** – Maps of Latton Priory: some maps have a road access running East to the Epping Road, but others have this route keyed as a "potential walking & cycling route". Firstly this is inconsistent – the public need to know what is

being consulted on. In addition, this is a key issue in terms of traffic / congestion / pollution / parking in Epping / capacity at Epping tube station / impact on Epping Forest. To this point Inspector Phillips had made it clear at the Hearings that this route was not to be a route for private motor traffic, stating that the preferred commute should be onto the M11, or to by Sustainable Transport to Harlow centre or railway station. Sadly at least one possible Masterplan we have seen has ignored this; developers would seem to be trying to elude an Inspector's statement.

Further, in an EFDC Cabinet meeting 7 /11/22, a Report was presented which was explicit that the road Eastwards was to be the primary vehicle access route; based on an earlier commissioned report. However when the Chair (Cllr C. Whitbread) asked if consideration had been given to traffic flows Southward (ie towards Epping & the tube railhead) or to the likely impact on the Forest; the answer was "not yet", but such work is projected. This seems to us that planners and developers are seeking to overthrow the position taken by the Inspector, and have arrogantly published such a recommendation without the necessary research. This poses a very basic question about the authority of the Inspectorate.