

Stakeholder Reference:

Document Reference:

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**Part A**

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**Making representation as Resident or Member of the General Public**

<b>Personal Details</b>	<b>Agent's Details (if applicable)</b>
Title	Mr
First Name	Clifford
Last Name	Mitchell
Job Title (where relevant)	
Organisation (where relevant)	
Address	
Post Code	
Telephone Number	
E-mail Address	

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## Part B

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### REPRESENTATION

**To which further Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 15

Supporting document reference:

**Do you consider this further Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: No

If no, then which of the soundness test(s) does it fail? Positively prepared, Effective, Justified

**Please give details of why you consider the further Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise and concise as possible. If your response exceeds 300 words please also provide an executive summary of no more than 300 words. 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.**

The latest ONS statistics should be used to determine Housing need per gov't statement. This would almost halve the need and release green belt land from development. Minister for Housing confirmed this approach should be used. The need should be reduced to circa 6000

**Please set out what change(s) you consider necessary to make the further Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise and concise as possible. If your response exceeds 300 words please also provide an executive summary of no more than 300 words.**

Using latest ONS data would reduce housing need to circa 6000.

## REPRESENTATION

**To which further Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 16

Supporting document reference: A. Council's response to Actions outlined in Inspector's note to Epping Forest District Council (Examination Document reference number ED141), October 2022 (ED144-ED144A)

**Do you consider this further Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: No

If no, then which of the soundness test(s) does it fail? Positively prepared,Effective,Justified

**Please give details of why you consider the further Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise and concise as possible. If your response exceeds 300 words please also provide an executive summary of no more than 300 words. 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.**

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.

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Strengthen the format and requirements of Strategic Materplans and Concept Framework Plans and confirm who will be consulted as it should be very wide.

## REPRESENTATION

**To which further Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 46

Supporting document reference:

**Do you consider this further Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: No

Sound: No

If no, then which of the soundness test(s) does it fail? Positively prepared, Effective, Justified, Consistent with national policy

**Please give details of why you consider the further Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise and concise as possible. If your response exceeds 300 words please also provide an executive summary of no more than 300 words. 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.**

Para 4.20 states that developments and a growth in traffic levels will increase pollutants. The mitigations proposed appear weak and after the fact. If they don't work it will be too late. 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.

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The APMS should be demonstrated to be compliant with pollution levels before new development proposals can be approved near to The SAC and SSSI areas. Proper monitoring of all SACs including Garnon Bushes SAC and SSSI should be undertaken.

## REPRESENTATION

**To which further Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 47

Supporting document reference:

**Do you consider this further Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: No

If no, then which of the soundness test(s) does it fail? Positively prepared,Effective

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Part B requires contributions to be made by developers but this is vague and open to interpretation and dispute. If costs are not quantified how can developers prepare budgets and determine cost effectiveness. This will lead to confusion.

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It should be clearly stated that costs will be clearly detailed and must be met by developers to ensure clarity.

## REPRESENTATION

**To which further Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 74

Supporting document reference:

**Do you consider this further Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: No

Sound: No

If no, then which of the soundness test(s) does it fail? Positively prepared,Effective

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Air Quality Management Area again – see MM40; but the Inspector should note that there has been no enforcement.

Clear legal obligation, but no action; but EFDC 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 the concern about some of the weaker commitments being made in these further MMs.

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Air Quality Management Areas should be strengthened and be enforced as a pre-requisite to allowing developments to proceed.

## REPRESENTATION

**To which further Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 77

Supporting document reference: A. Council's response to Actions outlined in Inspector's note to Epping Forest District Council (Examination Document reference number ED141), October 2022 (ED144-ED144A)

**Do you consider this further Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: No

If no, then which of the soundness test(s) does it fail? Positively prepared, Effective, Justified, Consistent with national policy

**Please give details of why you consider the further Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise and concise as possible. If your response exceeds 300 words please also provide an executive summary of no more than 300 words. 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.**

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.

Good to see 2 barriers set out; but there are other constraints – why are they not mentioned? 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.

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.

It is not clear 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 clarification is sought 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.

It is not clear 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.

The changes made in response to the Inspector’s actions list are not at all satisfactory.

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.

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 advanced at the time of the hearings, it is considered this site to be a poor one on most grounds and Inspector Phillip seemed to concur.

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.

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 attention is drawn 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.

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The Masterplan process needs to be re-evaluated.

References to Masterplans appear confused. The amended Paragraph 5.16 calls for planning applications to be accompanied by a Masterplan. It is recommended 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. It is considered 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 anticipated from the council and developers.

The aspirations for developer support of required infrastructure are weak and the decision making around this is subjective and unreliable.

Inspector Bore is requested to reflect on scepticism among the public locally as to the objectivity and effectiveness of the local planning process.

Signature: Clifford Mitchell Date:  
06/12/2022