

[REDACTED]

MM Consultation 2021
Planning Policy
Epping Forest District Council
Civic Offices
323 High Street
Epping
CM16 4BZ



22 September, 2021

Dear Sirs

Please see our comments on the Main Modification Consultation 2021.

We are members of The Epping Society and fully support the comments made by them and repeated below.

We also strongly believe that EFDC should adopt the suggestion made by the Plan Inspector that more recent ONS reports on Population Growth and Housing Need as this would reduce the requirement for new homes by nearly half to circa 6,500.

By adopting this reduced target the Council would have a realistic Plan with the potential for over achievement while meeting one of its objectives of giving development of the Green Belt a low priority. Given the reductions to Jessel Green, Epping South and other areas as well as the issues raised by Harlow Council on the Latton Priory development this becomes more important.

It is better to have a realistic achievable Plan than the alternatives of:

- i) A Plan with numbers that are difficult to meet where the Council is constantly playing catch up.
- ii) A Plan imposed on the Council by the Government. Or
- iii) No Plan at all that would involve a free for all of development applications.

We as like many residents of Epping would like to preserve the history and character of Epping and protect the forest and green belt land.

We trust you will give real consideration to our comments and those of The Epping Society.

Yours faithfully,

[REDACTED]

Clifford R. Mitchell and Pauline D. Mitchell

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Epping Society Comments

MM	Comments
Pre-amble	Removal of SP1 to NPPF makes sense
General	We note the removal of "EU" (etc), often replaced by "international". However there should be a significant shift of emphasis, EU Regulations were legally binding, 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.
	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.
	2.35 "conditions in the District" At this point we would have hoped to see the formal adoption of a code of Design Standards.
	2.39 good to see "without delay" deleted – as a loss of local input, and haste were looming.
	At (viii) the tense changes: "will have been", instead of "will be". Please justify or clarify
	(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)
	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. <u>we</u> are 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 nearly half – issues such as Green Belt, traffic, parking, Forest, pollution, could all have been to some extent mitigated.
	"For local people" – we still maintain strongly that the new homes will largely go to incomers; e.g. 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.
	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.
	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; e.g. Peregrine House; once offices, to be converted into flats. We 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	Part E – minimum job number quoted; good to see. Although the {} lacks a number! What rationale has been used to create this number? What mechanisms are proposed? On what date annually will the monitoring be published? We maintain the concern that the LP does not preserve existing employment sites, e.g. 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.
15	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. There seems to be no evidence to support the stepped "Projected housing requirement" especially taking

	into account the deficit from the past.
16	<p>HIAs – good to see. For “large developments” – but how large / small; 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.</p> <p>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 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>
	“Mixed uses and tenures” – but see the Qualis application for St John’s Road site.
17	<p>Great to see. All 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? There appears to be no specific provision for additional GP surgery capacity in Epping despite the present 2 surgeries already operating above capacity.</p>
	<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 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. We believe Latton Priory to belong socio-culturally 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
	<p>Land should not be removed from the Green Belt and instead be incorporated into local open space or greenspace categories as these are weaker 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 “greenspace” is not that.</p>
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 new

	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 the 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
	MMs 8, 14 & 27 are contradicted by the recent Qualis application to build an estate almost entirely of 1-bedroom flats in blocks, on the St John's Road site. Not following their own policy.
	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
	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, e.g. 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?
	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.
	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?
	"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 longer still if a motorway is blocked, which happens 4 or 5 times a year – even without Climate protestors!)
	(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.
	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?
	PRoW – good to see specific mention.
	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?
	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 diesel power. Any movement towards on-street / lamppost charging, as seen in some London Boroughs, Brighton, Bristol etc?
	EVs – several references to these, good. However, the policy should be future-proofed by mentioning emerging technologies e.g. fuel cells, hydrogen power. These may widely available within the lifetime of this Plan.
	F – "where appropriate", needs clarification. An effective LP will be harmed by vagueness
	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	<p>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.</p> <p>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?</p> <p>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"?</p> <p>Could we at least have an indicative Biodiversity Impact Calculator threshold as a metric?</p>
	<p>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.</p>
	<p>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.</p>
	<p>X.XX Visitor surveys of 2017 & 9; 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.</p>
	<p>Any survey data / consideration of the impact of introduction of car parking charges in the Forest? That will have reduced recreational pressure.</p>
45	Again there is aspirational wording – "seek to"; and again, the "last resort" – it should say <i>"refusal."</i>
47	B – "will not be permitted"; ought to be echoed by toughening up M44.
	<p>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?</p>
	<p>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"?</p>
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	<p>We 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.</p> <p>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.</p> <p>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.</p> <p>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.</p>

57	<p>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.</p> <p>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.</p>
61	<p>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</p>
63?	<p>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</p>
67	<p>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.</p>
69	<p>Why not simply impose Building Research Establishment Environmental Assessments Method on all new builds through Building Control?</p>
71/2	<p>District heating schemes should be at least considered for all new developments of above a certain number, especially where blocks of flats are proposed.</p>
74	<p>See AQMA points made in MM40.</p> <p>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> <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 was 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>A view was expressed 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 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. Documents should have been scrutinised for internal consistency prior to release – it gives such a poor impression.</p>
	<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>
	<p>Part D – lists "specified elements", but only some are "enhanced" or "improved"; why not all?</p>
	<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>No specific health provision; yet data for the original LP showed that the 2 surgeries are already overwhelmed. Have they been approached to see how a few thousand pounds each will help them with that problem? A letter from NHS in the recent Qualis applications advises that the 2 surgeries in Epping are already operating at over-capacity.</p>
	<p>No car pool or visitor parking or disabled parking !</p>
	<p>SOUTH EPPING WILL NOT BE A COMMUNITY AS PROMISED; JUST TWO SOUL-LESS HOUSING ESTATES, FAR FROM HIGH STREET, LEISURE, & SCHOOLS.</p>
EB1421	<p>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.</p> <p>Such an obstacle will also impair views across local countryside, including the Essex Way.</p>
	<p>Map – route of fuel pipeline not shown.</p>
	<p>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.</p>
	<p>4.3 "the (foot)bridge will give access to community facilities" – what are they to be?</p>
	<p>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.</p>

	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.
	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?
	Western half only has one link – see 4.6
	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.
	4.8 public transport links reduced; whether sustainable development? See MM17 etc
	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!
	6. Flooding; yes indeed – Brook Road!
105	<p>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 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	“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.
111	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.
112	We are disappointed there is no provision for public consultation in these plans for reviewing and updating the LP in subsequent editions.