

Matter 1: Legal Compliance

Issue 1: In preparing the Plan, has regard been had to national policies and advice; and to Neighbourhood Plans whether “made” or in preparation?

Hearing statement points

- i. We are unclear whether the EFDC responses to the Inspector’s questions have been considered by the full Council, the Cabinet or a sub-committee authorised by them to deal with these matters. We would welcome clarification as to the democratic means by which changes to the plan submitted during the hearings and any Main Modifications are to be considered. We believe that clarification ought to be a routine matter. However, we feel it is important that due process should be followed in view of complaints by several Councillors at meetings to approve earlier drafts who said they had not seen all relevant documents in advance.
- ii. We challenge the adoption of the draft Local Plan and the Submission Version on the grounds that Councillors did not take a serious approach to their responsibilities. During the meeting to discuss the draft Local Plan more than one Councillor was heard from the public gallery to question opposition on the grounds that most people in the room would be dead before it was implemented. We are seeking access to the webcast record which has been removed from the EFDC website. The Epping Society believes that local planning is not just a transient issue of convenience and practicality but touches on the character of the place and the heritage we hand to our successors. Most of our members have reasonable expectations of living to see the plans carried out.
- iii. Many points in the plan and other published evidence are unclear and there appear to be inconsistencies. The plan contains many errors, some of which the Inspector has noted. The following response was received from LDFConsult on 26 January 2018 and it suggests EFDC have not had access to all the data they reasonably required in order to fulfil their duties.

“With regards to number of dwellings in Epping, I agree with you that the numbers in Table 3 of the Settlement Assessment report look odd. Those numbers may be referring to housing density e.g. 14.8 dwelling per hectare for Epping. Technically speaking, the Council do not have an exact record of the number of dwellings in the District. What we do have is Council Tax record, which is a very good proxy for this kind of statistic. According to the latest figure from the Council Tax team (as of 15 January 2018), there are currently 5,514 dwellings in the town of Epping.” (emphasis added by EppSoc).

We acknowledge there may be data deficiencies in planning and Council Tax records but EFDC appears to have made no attempt to obtain, publish and consider reasonable estimates of density or existing housing numbers per community and major estate.

Issue 2: Is the Plan legally compliant in respect of how it accords with the Local Development Scheme (LDS) (EB101) and the Statement of Community Involvement (SCI) (EB104); and has the consultation carried out during its preparation been adequate?

Hearing statement points

- i. The range of consultation techniques mentioned in SCI paragraph 3 were not used for the consultations on the submission version of the local plan.
- ii. The range of consultation techniques mentioned in SCI paragraph 3 were not used for the consultations on the Harlow and Gilston Garden Town document June 2018.
- iii. Whereas site analysis has been done for proposed new sites in existing communities in EFDC (albeit we feel these are shallow), there is no such analysis for the proposed garden villages mentioned in LPSV policy SP4.
- iv. The consultation in the draft Local Plan was conducted unrealistically, the responses were largely ignored, and the conclusions reached were unsound.

- v. Having raised concerns about the duty to cooperate in our regulation 19 representations and having subsequently read the Duty to Cooperate Statement / Memorandum of Understanding, we remain unconvinced that the Council has discharged the duty to cooperate in preparing its local plan. Specifically:
- a. The consultation period was over a Christmas and New year period when many residents would have been committed to religious and family activities and not able to consider the voluminous and complex documents of the Local Plan. There was almost no publicity, no workshops, no roadshows or drop-in arrangements so the consultation came and went with many local people none the wiser.
 - b. Printed copies of the LPSV were not available from EFDC until after their staff returned from leave in January 2018. We recall the cost was £30 per copy. There was no advertising in Epping library to inform the public that a copy was available there.
 - c. While EFDC established a reference point EFDCConsult@eppingforestdc.gov.uk (for which we were grateful), its response times to questions was very slow and some of our questions were not answered before the consultation period closed. For example, our emails to [email address available but withheld for confidentiality] was not dealt with by EFDC because the staff member was part time and had gone on leave with no other staff dealing with her correspondence [emails with EFDCConsult@eppingforestdc.gov.uk dated 26 January 2018].
 - d. We requested an extension to the consultation period but it was not granted
 - e. Our members found the online consultation system difficult to use, cumbersome and slow. Certain members who thought they had made submissions have found the process did not complete, and this included IT literate professional individuals. Modern powerful PCs were needed to examine the plan documents online and to use the online response system because of the size of the files.
 - f. Representations were not listed under the sender's name in all cases and corrections had to be requested. The list of responses published since the consultation is not consistently prepared with many variations on data items that make it unusable without extensive data cleansing and accordingly it does not fulfil its proper purpose of enabling residents and consultees to assess the outcome.
 - g. The Epping Society representations for draft plan (2016) were not loaded onto the EFDC website until April 2018 after our representations. We modestly regard ourselves as the principal community society for planning matters in Epping and surrounding area and our thoughtful, extensive representations deserved to be available so the public generally could better appreciate a point of view different from the Council's. Representations for 2018 were loaded in the name of the officer who submitted the response instead of the organisation (The Epping Society) so, again, local people were unable to ascertain our views. These omissions suggest a lack of engagement by EFDC with the consultation process.
 - h. No attempt was made by EFDC to engage with The Epping Society and our many positive suggestions in response to the draft Local Plan have not found their way into the LPSV. We have seen no analysis of why representations generally were not taken up, other than within the site selection reports written by ARUP. EFDC appears to have ignored everyone else's opinions and ideas and public confidence in the local plan process has been lost.
 - i. Important documents were not available to residents before the consultation started nor by the time it closed. A further consultation period was opened after the documents were published but it was not available to anyone who had not responded first time nor to those who had not specifically said they wanted to see them. This significantly limited responses.

- j. Draft Local Plan – Feedback Interim report March 2017 showed a lack of support for EFDC’s draft plans, much of which remains unaltered in the submission version:

Q1. Do you agree with the overall vision that the Draft Local Plan sets out for Epping Forest District?					
	Strongly Agree	Agree	Strongly Disagree	Disagree	No Opinion
Question 1	78 4.4%	326 18.3%	928 52.1%	339 19.0%	110 6.2%
Q2. Do you agree with our approach to distribution of new housing across Epping Forest District?					
	Strongly Agree	Agree	Strongly Disagree	Disagree	No Opinion
Question 1	63 3.5%	195 11.0%	927 52.2%	462 26.0%	129 7.3%
Q5. Do you agree with the proposals for new employment development?					
	Strongly Agree	Agree	Strongly Disagree	Disagree	No Opinion
Question 1	55 3.3%	403 24.3%	353 21.3%	330 19.9%	515 31.1%

- k. Representations for the draft local plan were not made available effectively for residents. For example a representation by the respected London Green Belt Council (LGBC) (file number 3851) was dated 12 December 2016 but loaded on 20 November 2017. The document was shown on the EFDC website with the name of the LGBC redacted so readers could not tell the authority of its authorship. (<http://planpub.eppingforestdc.gov.uk/NorthgatePublicDocs/00587902.pdf>)

Issue 3: Has the Duty to Cooperate, as required by S33A of the Planning and Compulsory Purchase Act, been met?

Hearing statement points

- i. We believe, not sufficiently.
The fact that Essex County Council have raised so many substantial points in their responses to the LPSV indicates that consultation with that statutory consultee was poor.
- ii. Gilston was not significantly consulted upon in the draft Local Plan and its inclusion there pre-dated the [cooperation agreement] with East Herts DC which showed a failure to cooperate. Figures 3.3 and 3.4 of that document gave aggregate housing numbers around Harlow and the EFDC element had to be inferred. Draft policy SP2 gave an aggregate with no detail and Chapter 5 – Places had nothing whatsoever to say about development on Metropolitan Green Belt in our district around Harlow.
- iii. The initial SHMA included Broxbourne but that Borough withdrew so the resulting consultations on ONA between EFDC, Harlow and UDC was not optimal. We have seen no justification for believing the SHMA was the optimal area to test. A failure to consider and engage with London boroughs as our southern neighbours makes the exercise seriously defective – most new residents in EFDC are likely to come from them because they are not building enough homes. We are acting as a London overspill as shown by chart 2.11 in the draft Local Plan.
- iv. Epping Town Council made relevant representations to the draft Local Plan and the draft Neighbourhood Plan (which Epping Town Council has sponsored) also contained a number of proposals. We have not been able to find evidence about how this statutory consultee’s contributions were considered.
- v. 3365 Epping Town Council representation like others was presented as a continuous unformatted string of 5,000 words over several pages. References to Appendices suggest these were submitted but they have not been loaded onto the website.

Issue 4: Has the Plan been informed by an adequate process of Sustainability Appraisal (SA)? Have the requirements of the SEA Directive and Regulations been met?

Hearing statement points

- i. We believe that there has been inadequate planning to mitigate the expected negative SA impacts; and that insufficient considerations of alternatives have been fairly evaluated.
- ii. The identification of ‘reasonable alternatives’ is guided by the Environmental Assessment of Plans and Programmes Regulations 2004, Regulation 12 (2)(b), which requires the Sustainability Appraisal to evaluate reasonable alternatives taking account of the Local Plan objectives.
- iii. The Sustainability Appraisal (SA) has not adequately assessed the reasonable alternatives that it presents.
- iv. Specifically, the SA failed to examine current development densities in existing community boundaries to ascertain (a) what densities were reasonable and appropriate, (b) what densities should apply to any new areas and sites and (c) whether existing densities could be increased in order to meet the ONA housing numbers.
- v. Increased development density within existing communities would better maintain community cohesion and exploit already built infrastructure.
- vi. As a result of the failure to measure and consider development densities the plan fails to make a case for taking Metropolitan Green belt land. The response to the draft Local Plan by the London Green Belt Council dated 12 December 2016 explained the extent of this failure.

Issue 5: Have the requirements of the Conservation of Habitats and Species Regulations 2017 been met?

Hearing statement points

The Society considers that there has not been sufficient depth in the planning process to meet the HRA expectation; with particular concerns about Epping Forest, about the expected growth in traffic and about air quality.

Issue 6: Is the Plan legally compliant in terms of how it seeks to address climate change?

Hearing statement points

- i. We feel that a number of opportunities have been missed in this area.
- ii. We are surprised by the lack of electric vehicle charging points in the plan.

Issue 7: Is the Plan legally compliant in respect of superseded policies; mapping and monitoring?

Hearing statement points

There are concerns here e.g. the robustness of the monitoring measures the Council has planned for. Specifically:

4. Whether or not the A4 maps in the Plan form part of the submission policies map, are the legends clear and comprehensive? Some of the legends include designations not shown on the maps and *vice versa*. For example, the legend for Map 2.2 includes Traveller allocations, but there are none on the map. By contrast, Map 2.2 includes diagonal green hatching and green and brown dots which are not on the legend. Should such inconsistencies be resolved throughout the plan?
 - i. We found the plans and maps too small scale and legends were not complete.
6. Will the indicators in Appendix 3 enable the effectiveness of the Plan’s policies to be monitored?
 - i. Prospective developers need to know how the LPA is getting on with achieving its housing targets and the breakdown of housing types within it compared with the latest assessed needs (flats, older peoples’, family homes, etc). They also need to know (and the public need to be able to see

progress) on the IDP – planning, funding and delivery. There appears to be no intention to publish rolling data on these matters so management of the delivery of the plan is deficient in this regard.

- ii. We note the Authority Monitoring Report for 2017/2018 (undated) where a number of issues were held over until the next report. This seems to us an inadequate document and the data provided is too thin to facilitate effective monitoring of housing targets by type and infrastructure delivery and would not assist developers in framing their site development plans. The public would be unable to hold the LPA and developers to account without much better rolling data.

Matter 2: Context, Vision & Objectives and Sustainable Development

Issue 1: Are the context, vision and objectives for the Plan accurate and comprehensive?

Hearing statement points

While supporting many of the EFDC’s aims and visions we find illogicalities in the sequencing of the various stages of the process. Representations in response to the draft Local Plan and the LPSV show the public do not share the “vision” of EFDC and despite the statement in the LPSV Foreword by Cllr Whitbread and Cllr Philip that it was “a plan which belongs to all of us for our area”, that is clearly not the view of respondents

Issue 2: Is Policy SP1 concerning the presumption in favour of sustainable development necessary and consistent with national policy? Epping Society would urge the Council to take every opportunity to maximise sustainable development.

Hearing statement points

No comment.

Matter 3: The Quantitative Requirements for Development

Issue 1: Is the housing requirement for the plan period 2011-2033 appropriately defined having regard to the composition of the Housing Market Area (HMA); and the Objectively Assessed Need (OAN) for housing within the HMA?

1. Is the HMA comprising Epping Forest, East Herts, Harlow and Uttlesford Councils justified? Should the HMA include Broxbourne Borough? How has the influence of neighbouring London Boroughs been taken into account?

Hearing statement points

We have concerns over the lack of clarity about the key issue around the proposed numbers for new housing; and concern also around the question of densities.

- i. SHMA was a joint project between Broxbourne, Epping Forest, Uttlesford and Harlow LPAs because they were considered to form a coherent housing market. Broxbourne pulled out quite early so the SHMA was not an optimal study at all and may be considered deficient for that reason.
 - ii. The concept of “need” is not intellectually satisfactory as it is not a physical need and it does not relate to supply and demand. Clearly, at a price, there is unlimited demand from people outside the district to move here (and at another extreme, no one would do so). What “need” really means is how many homes should be provided in these LPAs for migrants to move into and is driven by central government’s need to find housing for the large increase in UK population in recent years. In this context “migrant” refers to those moving to EFDC area from anywhere else.
2. Does the SHMA July 2017 identify the *full* OAN for housing for the HMA and for Epping Forest specifically?
 - a. Was the standard methodology recommended by the Planning Practice Guidance (PPG) followed? Are any departures, particularly in relation to how migration and market signals were taken into account, clearly explained and justified?
 - b. Has consideration been given to the high level of housing need in the neighbouring London Boroughs emerging through the London Plan? If not, are the figures justified?

Hearing statement points

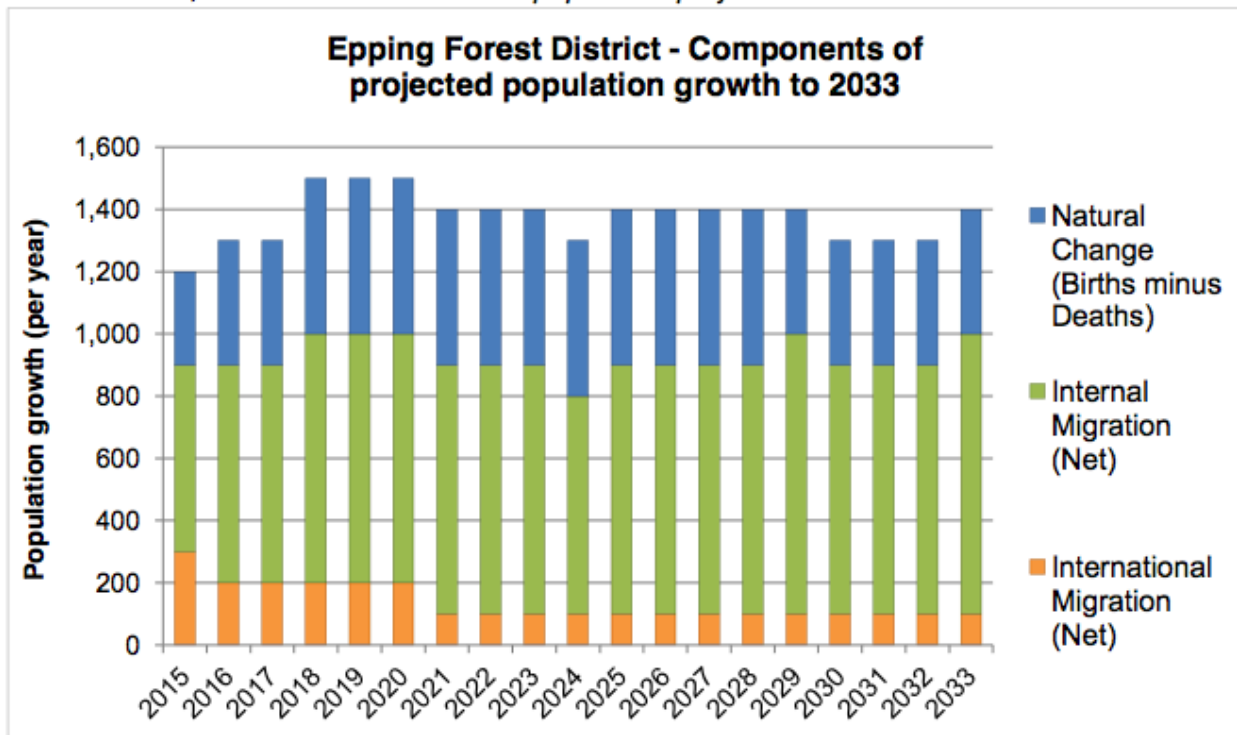
- i. We note that LB Havering, which is a nearby LPA, appears not to have met its London Plan or ONA housing needs. It has sought to “back load” housing provision out of the first five years land supply and that might put pressure on EFDC as its residents seek to move out; this will exacerbate the already existing infrastructure capacity issues here noted by the public and the IDP (EB1101A and EB1101B). Population migration between areas is already a component of the “Market” aspect of a SHMA, which is still part of the evidence base, so there should not be a further addition to the totals.
- ii. It is not reasonable that EFDC should have to increase its housing supply, especially in an area which is 94% Metropolitan Green Belt, in order to provide for internal migration as shown in Figure 2.11 of the draft Local Plan. Internal migration accounts for more than half the projected population increase in all years 2015 to 2033.
- iii. The fact that over 94% of the land in EFDC is Metropolitan Green Belt makes it a special case which should not be expected to find housing sites on the same basis as local authorities with no Green belt or a much lower proportion of Green Belt in their districts.
- iv. Objectively Assessed housing need:
 - a. EFDC’s “Draft Vision for the District” said “By 2033 Epping Forest District will be a place where ... new homes of an appropriate mix of sizes, types and tenures to meet local needs have been provided...”. The Local Plan does not ensure that local people have any priority and the

forecast natural increase in population does not require the number of additional homes included in the draft plan.

- b. Despite the references to demographic change there is little information in the draft plan to define the sorts of homes and location of different types of housing. Given the near-25 per cent increase in housing stock in the District, the demographics of the newcomers could well change the required housing mix from anything currently envisaged. However, there is no indication of that mix so residents have not had an opportunity to comment upon it.
- c. The chart below shows very clearly that the draft plan is largely to provide for internal migrants.

Figure 2.11 - Components of projected population growth to 2033

Source - ONS, 2014-based Subnational population projections



- v. What are the alternatives
 - a. Allow HM Government to impose a plan.
We do not think there is any reason to suppose that any plan imposed on us would or legally could be worse than the proposal now laid before us.
 - b. Campaign for the Protection of Rural England (CPRE) reported that over 460,000 houses are already planned in England’s Green Belt, a 62% increase in 5 years, of which 78% will not be “affordable”. That shows the huge scale of damage already in the pipeline and reinforces the case for resisting sites in the Metropolitan Green Belt in EFDC.
 - c. CPRE research shows:
 - enough derelict (brownfield) sites are available for 720,000 new homes in local authorities with Green Belts;
 - major house builders already have planning permission to provide over 280,000 new homes;
 - the number of long-term empty houses could provide homes for over 300,000 families;
 - strong protection for Green Belts helps the economy by promoting urban regeneration and keeping housing and business close to services and transport links.

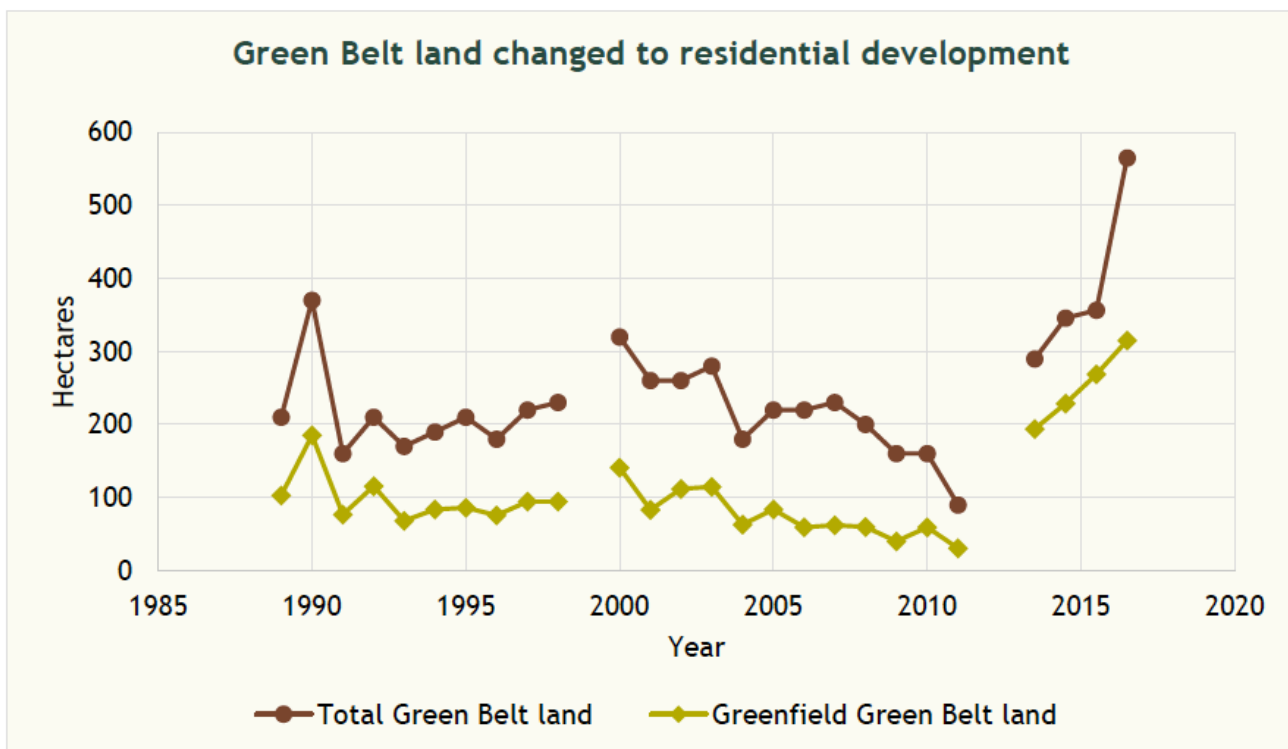


Figure 1: Total land area of Green Belt turned over to residential development per year. The years 1999 and 2012 had no data and new methodology was implemented from 2013^{viii}

- c. London First Group in association with Savills reported that development density in London is far below other capital cities and huge opportunities exist to increase density in places already well served with public transport. They conclude “notional space for approximately an additional 1.46 million new homes, approximately one million more than the current 10 year London Plan housebuilding target”.

(* <http://londonfirst.co.uk/wp-content/uploads/2015/09/Redefining-Density-0915.pdf>)

In particular, the housing density in central London is far below the density in many other cities, including Paris, which are regarded as high quality and which attract millions of tourists every year.

The GLA’s boundary accommodates 55 people per hectare on average, a total of 8.6 million people in 3.4 million homes. In inner London there are 101 people per hectare, but these are not high compared to other city centres. For example, the Department de Paris has a population of 2.2 million people and a population density of 213 people per hectare. Madrid’s Centro district has a population of 150,000 people, which works out at 286 people per hectare. This is almost double the population density of London’s densest boroughs such as Islington, which has a population of 200,000 at 138 people per hectare, and Kensington and Chelsea which has a population of 159,000 people at 130 people per hectare.

Central Paris is seen as one of the most desirable locations in the world, characterised by its mid-rise mansion blocks along grand tree-lined Haussmannian boulevards. We conclude that London could easily accommodate its growing population without resort to the Metropolitan Green Belt which is an environmental asset, a protection against urban sprawl and a joy to the many Londoners who visit for recreation.

- d. Recent estimates suggest the population of EFDC is now about 125,000 on a land area of 131 square miles. Taking account of the Metropolitan Green Belt that indicates a population density of almost 13,000 people per square mile (psm) in the non Green Belt area available for development.

For the whole of England the population density is 1,060 psm or about 1,200 after allowing for Green Belt across England. For comparison, Harlow has a population of about 84,000 living in 12 square miles at a density of 7,000 psm before deducting any Green Belt within the town, which is half that of Epping Forest.

It could be reasonably concluded that no additional development should take place in the EFDC area.

Issue 2: Does the Plan include an appropriate target for accommodation for Gypsies & Travellers and Travelling Showpeople District?

Hearing statement points

- i. Epping Society supports appropriate plans for itinerant groups (including other caravanners) – our concerns focus on issues with the Metropolitan Green Belt & infrastructure.
- ii. We are anxious that sites designated for travellers should not become development sites if their use drops away over the years but instead should return to undeveloped Metropolitan Green belt or agricultural land, as it was before.

Issue 3: Is the Functional Economic Market Area (FEMA) upon which the Plan is based appropriately defined; and are the requirements for job growth and employment land set out in the Plan justified?

Hearing statement points

- i. We would seek a growth in suitably located employment sites, and have concerns about the loss of some existing ones.
- ii. We are particularly concerned about a proposal to convert to housing an existing employment site in Epping.
- iii. Employment sites should be located so far as possible within walking distance of housing or good public transport so the use of motor vehicles can be moderated.
- iv. We are not persuaded there is any validity in the M11 corridor which has informed the LPSV. There is no common commercial, industrial, educational or political connection between the communities in this “corridor” and their only relationship is to a road. The public are largely unaware of this conceptual corridor save as a means of road transport. Accordingly we feel the LPSV may have been misconceived.

Issue 4: Is the Plan justified, effective and consistent with national policy in respect of the approach to meeting identified needs for retail development?

Hearing statement points

- i. We are wary of calls for increased retail capacity, preferring more effective use of the existing areas, especially High Streets.
- ii. Many Epping shops are currently unoccupied, many more have new businesses which are not proven and several are let to charities because market rentals could not be achieved. This suggests to us that the decline of our High Street would be exacerbated by additional retail outlets anywhere in the town or neighbouring communities. The EFDC owned retail park at Loughton and the EFD controlled vacant shops at the “Winston Churchill” flats development appear to have a continuing deleterious effect on Loughton Broadway shops, which are reported to be struggling to survive.
- iii. We also oppose the extension of the retail frontage in Epping as that would dilute the High Street offering and tend to undermine the town centre by dispersing footfall.

Matter 4: The Spatial Strategy/Distribution of Development

Issue 1: Does the distribution of development in the Plan place too much reliance upon the Garden Community Sites around Harlow at the expense of testing the capacity of the other settlements in the District?

1. How was the amount of housing proposed in the three Garden Town sites allocated in Policy SP5 determined (3,900 dwellings in total)?

Hearing statement points

- i. Epping Society feel that the Garden Towns were poorly consulted on. Also that developments (wherever) need to reflect existing, or guaranteed expansion of services & infrastructure – bearing in mind that these are already below a satisfactory standard.
 - ii. No communication was received by us or any others who responded to the draft local plan to inform us about the “Harlow and Gilston Garden Town” document June 2018. This is indicative of the approach to consultation by EFDC. “Harlow and Gilston was designated as a Garden Town by MHCLG in January 2017 and will comprise new and existing communities in and around Harlow” is the first statement in the document and indicates that no genuine public consultation on the fact is permitted.
 - iii. We believe that Harlow has a very low density in which considerable additional development could take place. Much of the housing stock in certain parts of Harlow appears to be of poor quality by today’s standards, ecologically inefficient and space hungry by design. The additional communities proposed around Harlow will constitute urban sprawl of the town of Harlow.
 - iv. There is every reason to suspect these new communities will not become part of the community of Harlow. We refer to the Church Langley development which was marketed as other than Harlow and it has a distinct postcode. We do not believe Church Langley has integrated socially or culturally with Harlow and the new appendages will not do so either, which is not effective town planning.
2. Could a higher level have been accommodated and would this have reduced the impact of growth proposed elsewhere in the district?

Hearing statement points

Given the large proportion of housing sites proposed to be in the Metropolitan Green Belt we believe a higher development density should be required, not only in existing developed space but also in the new sites, in order to minimise damage to the Metropolitan Green Belt.



<https://www.cpre.org.uk/resources/housing-and-planning/green-belts/item/4931-state-of-the-green-belt-2018>

3. Conversely, will the level of growth proposed elsewhere in the district be sufficient to support the vitality and viability of individual settlements over the Plan period?

Hearing statement points

- i. The Epping Society does not believe there is any evidence of a lack of vitality caused by the current size of communities or any evidence of a low rate of growth in housing numbers. We believe the reverse is true for Epping and other places. Large rates of growth on sites away from existing

development (as at South Epping and the application currently in play for the Golf Club at NWB) will tend to prevent community integration and lead to a divided town.

- ii. More significant causes of instability in our community have been unrelated to the size of the community and include:
 - Loss of library and police station
 - Prospective loss of the main civic hall
 - Collapse in public services and their remote location away from the town or (in the cases of schools and GP surgery) at the very edge of the town.
- iii. The Epping Society argues for increased densities both on new sites and existing ones to minimise GB damage. We also argue that increased densities may assist in better being able to attract public transport in the future. For example, we know areas of East London comprising terraced streets which have good bus services (regular and frequent). Such services are almost unknown in EFDC where infrequent and limited are the usual words used to describe buses.
- iv. The Government have recognised the desirability of high densities near existing public transport nodes and increased densities elsewhere can generate additional passenger loads to support buses which low density cannot. Buses are seen as a means of reduced private motor journeys.
See <https://www.building.co.uk/technical-case-studies/housing-density-does-it-stack-up/5092832.article>
- v. We note the NPPF requires local planning authorities to take a pro-active role in identifying and bringing forward land suitable for development needs (such as sites in public ownership and sites on brownfield registers). The NPPF actively encourages authorities to take a role in facilitating land assembly, promote and support the development of under-utilised land and buildings (especially to meet identified housing need where land supply is constrained, as it is in EFDC by the Metropolitan Green Belt and transport infrastructure limitations), and supporting opportunities to use the airspace above existing residential and commercial buildings (we take it this would include public buildings and railway land, trackbed and buildings).

CPRE reported: “There is enough suitable brownfield land to provide a minimum of 720,000 homes (more than 23,500ha) in local planning authorities with Green Belt land (from the 181 local authorities that published brownfield land registers out of the 185 local authorities that have Green Belt land). More than 440,500 of these homes could be built within the next five years (from 163 local authorities with the data). On average, local planning authorities with Green Belt land have 4.6 years of housing supply in suitable brownfield land.”

4.6 years

The average supply of suitable brownfield land in local planning authorities with Green Belt land.

- vi. We argue that where there is such a shortage of space for sites that paragraph 123 of the NPPF 2018 should carry great weight:
 - plans should contain policies to optimise the use of land in the area, including minimum densities for areas where there is good public transport. This should result in an uplift on existing densities in those areas. We understand these policies will be tested robustly at examination;
 - use of minimum density standards should be considered for other areas;

- applications should be refused where they fail to make efficient use of land taking into account the policies in the framework and that should include minimising the damage to the Metropolitan Green Belt in accordance with national policy.
- vii. We do not accept that the Local Plan has achieved optimum efficiency of land use. Although the EFDC Local plan is to be considered against the 2012 NPPF, we consider NPPF 2018 indicates the direction of national policy and Paragraph 136 has not been given adequate attention or weight, in our view (increasing density in own and neighbouring LPAs) to minimise the effect on Metropolitan Green Belt. Para 132 emphasises the national policy of the “great importance [attached] to Green Belts”.

Issue 2: Beyond the Harlow area, is the distribution of development in the Plan justified having regard to the defined settlement hierarchy?

1. What are the key factors which informed the distribution of development in the Plan beyond the Harlow area?

Hearing statement points

It appeared to us that sites were selected on the basis of a “call for sites” as mentioned in the SCI and accordingly what was put forward by owners and developers rather than following an objective analysis of merits on town planning grounds.

2. How was the settlement hierarchy set out in Table 5.1 page 114 defined, and is it justified? Has the settlement hierarchy informed the distribution of development and if not, what is its purpose?

Hearing statement points

It is unclear to us how settlement hierarchies have guided development site selection. It is clear that settlement hierarchy is unrelated to community size and accordingly development should not be allocated on that basis, but on objective planning basis and a capacity for the community to absorb additional numbers of people, traffic, pupils etc.

3. Is the settlement hierarchy justified in respect of how employment opportunities were taken into account e.g. in Nazeing?

Hearing statement points

We are troubled that employment proposals seem not to relate to either community size, settlement hierarchy or additional site proposals.

4. Is it justified for North Weald Bassett (NWB) as a Large Village to be allocated more development than the Towns of Loughton, Waltham Abbey and Ongar? More generally, would the proposed growth of NWB be disproportionate, particularly when development at nearby Thornwood and Hastingwood is taken into account?

Hearing statement points

- i. The communities of Thornwood and Hastingwood have almost no local services. Thornwood is as much associated culturally with Epping as it is North Weald.
- ii. We do not think the development at NWB has been thought through properly. The village has limited local services and none are proposed to be added as part of the planned additional sites. There appears to be a real possibility that rejected sites may gain planning consent on appeal so it would be advisable for a Masterplan to be compiled for NWB as a matter of urgency so coordinated development can be agreed in conjunction with local needs for traffic management, infrastructure and services (shops, pubs, etc).

- iii. While we would not advocate high density development in semi-rural communities, it is unacceptable to plan for low density development on Metropolitan Green Belt land in this, as any other part of the district.
5. Is the relatively limited growth at Buckhurst Hill and Theydon Bois as Large Villages justified by comparison to that proposed at Nazeing and Thornwood as Small Villages?

Hearing statement points

The rationale for these decisions eludes us.

Issue 2: Beyond the Harlow area, is the distribution of development in the Plan justified having regard to the defined settlement hierarchy?

Hearing statement points

We believe this is not the case; also that there seems to have been some disproportionate changes between the draft and final Versions to the sites in which development is planned and a disproportionate number of new sites have been allocated to Epping. Despite having a population similar to Buckhurst Hill and Chigwell and one third that of Loughton, we have been allocated many more new houses at such a level as to seriously impact our community with (we think) 1,477 new homes in Epping and Thornwood compared to an estimated 5,514 today (27 per cent growth).

Issue 3: Is the distribution of employment land in the Plan justified in light of the distribution of housing?

Hearing statement points

- i. It is not proportionately distributed, and should be; “work near homes” or “work near (reliable, adequate) public transport” should be explicit in the Plan.
- ii. In particular it would be unsound and unsustainable to convert existing employment land to housing.

Issue 4: Is the distribution of development justified in respect of the need for, and approach to, Green Belt release?

Hearing statement points

- i. With 92.4% of the undeveloped area of the district Metropolitan Green Belt, this is a major concern to the Society and community. We feel that alternative strategies (eg brownfield, greater densities) have not been adequately considered, nor has a full range of alternative sites been fairly assessed. We are strongly committed to the preservation of the Metropolitan Green Belt; as the original stated needs for Metropolitan Green Belt have come under greater pressure, so the need for Metropolitan Green Belt conservation has become more imperative.
- ii. The approach of EFDC has been flawed from the beginning. Its Local Development Scheme (LDS) (EB101) pre-judged the “release” of land from the Metropolitan Green Belt whereas such a decision should have been the last resort.
- iii. We submit that (i)the plan is inconsistent with the NPPF, (ii)The Draft Local Plan is unsustainable and we believe the submission version has made negligible changes towards sustainability and (iii) the Draft Local Plan is unjustified.
- iv. Proposed modifications - we suggest the following modifications:
 - Revise housing targets taking into account the restriction that preservation of the Green Belt requires.
 - Remove all Green Belt site allocations from the Draft Local Plan.

- v. We draw attention to the case made by LGBC in its representation to the draft Local Plan which appear to have received negligible attention (file 3851 loaded 20 November 2017 but dated 12 December 2016).

Issue 5: Is the distribution of development justified in respect of the approach to flood risk; and to protecting water quality?

Hearing statement points

The Society feels that flooding, water supply and sewage have not been satisfactorily planned for. Some sites that were rejected have less difficult hydrological characteristics than the chosen ones.

Issue 6: Is the distribution of development justified in respect of its effect upon transport and other infrastructure in the District? Will the Plan be effective in securing the infrastructure necessary to support proposed growth?

Hearing statement points

- i. This is a major issue of concern to the Society, and to a majority of residents who replied to the consultation. Transport & infrastructure are already under proven pressure, and many of the proposed developments will exacerbate this. The mitigation measures proposed do not convince. In addition there appears to be no evidence of contingency planning for the paralysing impacts on the all-too frequent occasions when one or other of our 2 local motorways is shut, through accident etc.
- ii. The sustainability of development in Epping appears to be excessively predicated on the TfL Central Line train service. We do not accept that the evidence supports the proposition that this is adequate for the load on it now and foreseeable even without the additional proposed housing in Epping and the area from which many commuters will seek to use this service.
- iii. The Jacobs Ringway report does not appear to have taken account of the current proposed sites nor made any allowance for significant additional road traffic through Epping and Loughton arising from development sites to the north of these communities. There are already several traffic junctions operating above design capacity and even with proposed mitigation measures these will become greatly worse, excluding the additional traffic we have drawn to attention (Wake Arms, Bell Common, Woodredon Hill, North Weald road from Epping).

We consider the traffic assessment should be revisited to deal with these issues before any material additional development takes place. We have more to say on this under other Matters.

Matter 7: Place-Shaping & General Masterplan Approach

Issue 1: Is the application of Policy SP3 to all allocated sites justified; and is it otherwise effective and consistent with national policy?

Hearing statement points

Epping Society has a number of concerns here – that there should be a minimum cut-off for some of the more detailed requirements (so smaller developments and extensions do not have to comply with detailed studies or contribute unless by way of CiL); that the density question has not been adequately investigated; that historic (and also landscape) legacy features should be more protected; and that for healthy communities, Metropolitan Green Belt & air quality are issues needing more focus.

The issues and questions suggest the need for more careful analysis and drafting.

5. Part H(v) requires development to promote healthy and active lifestyles. Does the Plan as a whole respond sufficiently to the requirements of Section 8 of the NPPF on “promoting healthy communities” by facilitating social interaction and creating healthy, inclusive communities? Is a specific overarching policy on health and well-being required? (Reps ECC).

Hearing statement points

- i. We believe health issues attendant on the development of South Epping, so close to overhead power lines and the pollution from the M25 motorway (the M11 interchange is also close by) were inadequately considered. This also arises under Matter 15 Issue 2.
- ii. We believe the scale of development proposed for some communities, including Epping, and the large size of the South Epping site, will tend to work against social integration. Given its distance and topographical situation compared with Epping town centre it is not difficult to imagine that future residents will avoid visiting because of poor parking, heavy traffic and unaccommodating distance and hills.

Issue 2: Are the Plan’s requirements for master-planning (as explained in paragraphs 2.89-2.102 and set out in Policies SP4, SP5 and certain Place policies) justified; and will they be effective in securing the timely delivery of comprehensively planned schemes?

Hearing statement points

- i. We consider that the various policies, concepts panels etc are poorly defined; there is a costly external Design Review Panel in place, but the Terms of Reference or Minutes are not readily available; and lastly there are a number of conflicts between the Local Plan and Neighbourhood Plans (eg Epping Town Council’s Response to the LPSV)
- ii. We would like to see a locally and publicly constituted QRP which could comment, in the way of a Statutory Consultee, on all developments they see fit. In a historic market town even a small development can cause significant damage. Such damage was extensive in the 1960s to 1980s with inappropriate plate glass shop fronts, unsuitable roof design and out of place fenestration on new buildings.
- iii. We are not satisfied that local people will have sufficient influence over Masterplans, and other such reports. EFDC has not had a history of embracing public representations which appear to be regarded as a nuisance at best.
- iv. The draft Local Plan which was consulted-upon in 2016 did not outline any plan to appoint a commercial organisation to run a design review service (Quality Review Panel) nor did it restrict the range of its review only to sites of over 50 houses. The narrative described an intention to ensure

good design without qualification which is what we took into account when we responded to the consultation. We said the following, which we reiterate:

“DM 9 High quality design

The Epping Society proposes that the public generally should be able to give their views on Masterplans. We propose that an advisory design panel should be established which would comment when it thought fit on any planning matter and the planning committees and the Council would undertake to give consideration to their views. Paragraph 62 of the NPPF says “Local planning authorities should have local design review arrangements in place to provide assessment and support to ensure high standards of design.” Design guides should be developed and consulted upon.

DM 9 policy E – We need to know more details of the Design Review Panel as we do not want yet another consulting firm.”