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24<sup>th</sup> April 2019

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Dear Louise,

Local plan hearings in May 2019

In Andrew's absence I enclose two copies of our hearing statements for Matters MI5, 9, 10,12,13,14 and may I ask you to acknowledge safe receipt. We have also sent a copy to your email address.

We will advise the names of our representatives nearer the hearing dates. It is our intention to have the Society represented at all of the hearings, where we would hope to explain our views, ask questions etc.

We explained the background to The Epping Society in our covering letter for the hearing statements dated 24 January 2019.

Yours sincerely

Charlie Geddes

Planning- Epping Society      [planning@eppingsociety.org.uk](mailto:planning@eppingsociety.org.uk)

# The Epping Society

## EFDC Local Plan Inspection – Hearing Statements, 2019

Part 3, for Matters raised by the Inspector, MI5, 9, 10,12,13,14

Submitted by Thursday 25 April 2019 by The Epping Society

The following summaries are offered as an introduction to the responses of The Epping Society to the SVLP. It is our intention to have the Society represented at all of the hearings, where we would hope to explain our views, ask questions etc.

### Matter 15 Places & Sites

**Issue 1:** Are Policies justified, effective, consistent with national policy? Refer – site specific requirements, infrastructure requirements, school expansions, pedestrian & cycle links, flood risk & air quality, map legends, Stapleford airfield

#### Hearing statement points

- i. The Epping Society suggests that the level of duplication, repetition, confusion within these policies are indicative of a disjointed and flawed plan-making process. Policies need to be clear and precise so that the actions resulting can be expected to be implemented, by whom and in what time frame. This is particularly relevant to actions needed to mitigate the impacts of the proposed developments – the Inspector has rightly identified education, cycling, flood risk, air quality as issues which are at present already unsatisfactory and will need addressing, lest the negative impacts of the Plan swamp the benefits. To these could be added health & dental services, the possible relocation of Council Offices, library closures etc. Further evidence of a generally unsatisfactory plan-making process would be the 15+ year saga which still sees EPP.R4 standing derelict, a lack of "grip" on parking issues throughout the District (now to include multi-storey several significant car parks), and the loss of much-needed employment sites to housing (eg EPP.R9)
- ii. We also have concerns about the Quality Review Panel. It was set up only in April 2018 after LPSV consultations, i.e. it is a later bolt-on, not part of the original policy for planning. It should have a wider constituency and a greater range of inputs; an example, according to the Terms of Reference 3.6, the QRP could, but has never invited us to be present and we wonder if any "community groups" been so favoured? Reports from the QRP "are published on EFDC website", but are not identified by the EFDC search box, i.e. not easily accessible. We note that the draft Local Plan Draft Policy DM9 and associated narrative made no reference to outsourcing the QRP to a commercial business nor to excluding the public from its affairs. Lastly, we cannot find the total budget or actual costs of the QPR to date – but the per item costs listed seem very high.
- iii. To focus on air quality, we recall that EFDC have had for many years an AQMA in the Epping area. A plan was written, but the only mitigation to date has been a forest-wide speed limit. Surely national policy (in spirit if not in letter) would expect a Local Plan to be addressing that with urgency? To the contrary, developments almost anywhere in Epping & settlements to the North are likely to exacerbate air pollution in the AQMA. There is no evidence of continuous monitoring nor of other places where high traffic flow, often at stop-start speeds, might be expected to exceed AQMA levels.

**Issue 2:** Are the Plan's policies for the specific places and sites within the District justified, effective and consistent with national policy; and are the specific site allocations they include justified and deliverable?

#### Hearing statement points

- i. The policies are not clear, eg our responses to App 6 were made on the assumption that they were not policy, subsequently this was not the case. Also part B of P1 allows little scope for modifying the proposed density of sites, but this appears to have actually happened already with the EFDC

publication of technical advice by Brookbanks Consulting Limited (BCL) which was commissioned by both Hallam Land Management and Commercial Estates Group. Albeit not for Epping but for Policy SP5F(i) (Latton Priory), it proposes to increase the quantum beyond the 1,050 units currently proposed by Policy SP5F of the Local Plan Submission Version (LPSV).

- ii. If App 6 is policy we ask that the proposed (financial contribution to Epping Forest SAC should be quantified at this stage (alongside the report on financial contributions already promised but not yet available) concerning other financial contributions to S106, IDP and possible CIL charges.
- iii. For the record we consider the projected number of car journeys from the proposed development completely unrealistic (the report suggests there would be fewer than one vehicle movement for every four dwellings per day).

### **Policy P1:**

#### Hearing statement points

#### **Epping – general 1.** Powerlines over EPP.R1, R3 and E1.

- i. This is a very serious concern, aesthetically and for health & safety. We feel the presence of the lines did not have sufficient weighting in the early stages of the process which must relate back to the policies which drove them. In particular we would wryly point out that EB805A refers to a (national?) standard that traveller sites have to be at least 150m from such power lines. This presumably creates a no-go swathe of 300m which developers cannot use otherwise standard residential units would have a lower proximal threshold? This should have come into the site filtering process at a very early stage.
- ii. We could not see this green stripe (SANG perhaps?) on any draft Master Plan. Parents will need to be reminded that kids should not fly kites here! We can see these powerlines affecting the price-yield of part of the site; perhaps this is planned for the affordable homes?
- iii. We would make similar points about the gas/oil pipe which crosses the corner of the site – this reduces the area available, should have been factored in much earlier.

#### **Epping – general 2.** Relocation of Ivy Chimneys primary school

#### Hearing statement points

- i. The Epping Society would prefer existing schools be expanded if possible, to preserve the current level of community affiliation & support. The disruption of a move would adversely impact children's education.
- ii. We are also concerned that "building a new school" has in the past been used by EFDC as a "proxy MGB acquisition". There is an existing under-capacity in the Epping primary sector, we are aware of children having to go out of town; this should be addressed now, not in 5 or 10 years time; the policy has failed to start from the right place.
- iii. Moving a school nearer to an AQMA, an overhead power line and one or two motorways should be approached cautiously.

#### **Epping – general 3.** historic assets

#### Hearing statement points

The Epping Society would have liked to see a stronger policy & commitment to historic assets in the area. They are a significant part of the area's cultural, social & environmental persona – much vaunted in developers marketing. Sadly EFDC has a poor track record in identifying, recording, preserving and protecting these; we had hoped for more rigorous policies.

#### **Epping – general 4.** Proposed secondary frontage

#### Hearing statement points

We have concerns lest there is consequent damage to the existing town centre retail provision. Experience, supported by Epping Town Council, indicates that High Street retail is already struggling; a simple evidence is the number of empty units in Epping High Street and the high churn rate of certain properties where successive ventures have failed. This issue is contentious. For example traders in the Broadway, Debden repeatedly complain that the new

Epping Forest Retail Park is reducing their footfall, indicating a high number of shop closures; meanwhile surveys by Council consultant's report that there is no deleterious effect.

### **Epping - Site Specific Matters – Epping South (EPP. R1 & 2)**

- a. Distance / topography to town centre & therefore traffic
- b. Adjacent to M25, noise, air quality
- c. Effect on existing town centre
- d. Safe access to Ivy Chimneys Road
- e. Small area for employment, valid?
- f. Restrictive covenants
- g. TfL line divides the site; bridge?
- h. Phasing
- i. Green Belt impact

#### Hearing statement points

- i. The Epping Society has a number of points to make on these matters; the broad thrust is that Epping South has so many restrictions, constraints and problems, that it should have definitely been rated as a less-favoured site. We want to emphasise that this is the general community consensus (as explored with 200 residents in our over-subscribed public meeting in January 2018). We have met only a microscopic number of local people who think this is a "good" site. We will be happy to expound on these points at the Hearing; and we expect there will be other local community groups expressing these views too.
- ii. We would want to add other "issues" relating to this site such as – flood risk, traffic flow beyond Ivy Chimneys Road, the AQMA, narrowness of exit routes to the North and East, electricity & gas lines, doubts over the likelihood of modal shift, visibility, public footpath, minimal bus services & impact on the very near at hand (of the order of 500m) Epping Forest SAC. We would advocate that Brook Road/Ivy Chimneys Road be considered as the "natural, defensive boundary" to the town; rather than the motorway (which we are aware is often the arbitrary boundary preferred by developers and some Councils.)
- iii. Also we feel the Council have not adequately explored an alternative approach, that of increasing housing densities within existing residential areas. Accordingly in our District and throughout the SHMA the opportunities to redevelop existing areas has resulted in the all-too-easy proposals to take MGB land.
- iv. The EFDC approach appears to be diametrically opposite to the Mayor of London whose London Plan states that "The Plan aims to accommodate all of London's growth within its boundaries without intruding on its Green Belt or other protected open spaces", and the pledges to "protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces ... promote the creation of new green infrastructure and urban greening... (and) work with boroughs and other strategic partners to enhance access to the Green Belt and to improve the quality of these areas in ways that are appropriate within the Green Belt."
- v. While localism calls for policies to suit local circumstances it seems perverse that an LPA with a high proportion of Metropolitan Green Belt has made less effort to protect it than a large urban area such as London.
- vi We have found a document on the EFDC comparing Epping South to 2 other sites – in which R1/2 emerges very unfavourably. The date and origin are not clear; but sit's presence implies that at one point the Council held that opinion?

[planpub.eppingforestdc.gov.uk/nIM.websearch/.../Download.aspx?ID=601829](http://planpub.eppingforestdc.gov.uk/nIM.websearch/.../Download.aspx?ID=601829)

### **6. EPP.R5 (Epping Sports Centre): relocation plans in town, how definite, timing?**

#### Hearing statement points

The Council have recently released an intention to relocate the Sports Centre (maybe with a swimming pool) to the vacant EFDC site in St John's Road; this supported, with the caveats of timing and the provision of additional car parking. Is this relatively informal statement by EFDC to become policy as, if, not many residents will doubt it would

ever be delivered.

#### **7. EPP.R8 (Civic Offices):** Listed status.

##### Hearing statement points

We believe that relocating the Civic Offices will result in loss of public access, loss of income for town centre businesses, and increased traffic. On this latter point, recent informal survey work (in March) has indicated that the vast majority of staff driving to the Council Offices at present do so on a one-in-a car basis; yet they advocate a policy involving car-sharing! We also note there are no bike racks at these offices despite the draft policy to achieve travel modal shift.

#### **8. EPP.R11 (Epping Library) :** Is the loss of the library justified?

##### Hearing statement points

We regret the loss of the facility, activities and employment which will result, but accept that use has changed. We also regret the proposed loss of a not unattractive building in exchange for a very modest number of residential units at a time when commercial businesses find it difficult to get employment premises in the town, following so many permitted development conversions of offices to flats. As with the proposed relocation of the sports centre, we would wish to see it a policy matter for alternative provision of a library within the town, albeit on a smaller scale. We do have families who need to borrow books, study in quiet conditions, use a browser and access public documents, etc.

We call for it to be a matter of policy that a library will be located within the town centre if the current facility is closed.

#### **Policy P6 : North Weald Bassett (NWB) &**

#### **Policy P11 : Thornwood**

##### Hearing statement points

Plans to increase populations in these settlements (as well as in Latton Priory especially), seem certain to generate additional traffic through the district, especially to Epping TfL (which acts as a railhead for a large area of Essex, East Hertfordshire etc). We are not convinced by the projected high levels of modal shift; and even with those and the mitigations proposed, reports such as the two Ringway projections cast a gloomy cloud over the future load on the road infrastructure and the Forest SAC.

#### **Matter 9 Open Spaces**

Issue 1: Are the areas of District Open Land designated within the Plan justified and consistent with national policy?

##### Hearing statement points

- i. The policy on Open Spaces seems presently confused. It is important that this is resolved. The proposed losses to Metropolitan Green Belt do not merely represent white areas on a map – the countryside of the District is rich in footpaths & bridleways, along with beautiful scenery and impressive views which are enjoyed by many for their freshness, health-related benefits and spiritually enhancing character. The routeways are protected, but if developed these rural benefits are removed; making it more important that open space within settlements is protected.
- ii. Rather than take land from the MGB for it to become “Open Spaces” within developed areas we prefer the land remains MGB. This is because we have no confidence EFDC would not develop the Open Spaces in the future, as with Jessel Green.
- iii. We have to say that it is a contradiction to see discussion of this topic when the Council continues to list Jessel Green for development.

#### **Matter 10: Natural Environment, Landscape Character and Green & Blue Infrastructure**

##### Hearing statement points

- i. There remains confusion here too, particularly between the Local Plan and some Neighbourhood Plans which propose green stripes or wedges in and around towns.
- ii. A particular specific issue for the Green infrastructure is the circumstances at the Ivy Chimneys/Bell Common traffic lights. Here the Forest (both wooded and grassland) is at a very narrow point – we estimate as little as 30 metres wide. This is a “wildlife corridor bottleneck”, crucial for foraging fauna. The traffic mitigations proposed (as yet undefined) might require narrowing this wildlife

corridor further, maybe road-widening or constructing pedestrian / cycle paths. There are other possible solutions and we would encourage flexible thinking here from the Council. For example, to the west of both Ivy Chimneys/Bell Common traffic lights and at Wake Arms there is non-forest land which could be used instead of taking forest for roads.

iii. The purpose of protecting the natural environment includes the fauna and flora for its own sake but also to enable people to enjoy them and, as a result, to support their protection. At present it is difficult to access the Forest from Epping during wet conditions because the main route is over Bell Common which becomes impassable to other than fully able bodied people wearing suitably robust footwear. The only alternative is along the B1393 and there is no proper crossing point at Ivy Chimneys/Bell Common traffic lights nor any pavement on Ivy Chimney Road. If that junction is to be enlarged to cope with the anticipated large increase in traffic (see Jacobs Ringway) then that becomes an even more difficult choice, especially for the elderly, infirm or for those with children in buggies and cyclists.

## **Matter 12 : Employment**

**Issue 1:** Are the requirements of Policy E1 justified, particularly in respect of financial contributions?

**Issue2:** Will Policy E2 be effective in protecting the vitality and viability of the District's identified centres? Does it support the role of retail warehousing, if appropriate?

**Issue3:** Will Policy E3 help to support the growth of the locally important glasshouse industry?

### Hearing statement points

- i. We regret the loss/reallocation of existing sites and the uneven distribution of the proposed new industrial sites – both of which will lead to increased journey-to-work movements. The Plan should offer greater opportunities for people to work near where they live so existing employment sites should not be converted to housing.
- ii. Further, care should be taken to avoid damage to existing economic activities of all sorts, be they shopping centres, pubs, agricultural production (farms, garden centres, glasshouses etc.) or industrial areas. We have particular concern about retail – changes in shopping habits have reduced footfall & spend in physical retail environments; we feel that planning to develop any other areas for shopping will have an increasingly significant effect on established retail outlets, and especially the District's high streets – some of which are already showing signs of stress. We do not know how this could be predicted/estimated?, but we suggest that new residents in our area (many time-poor commuters) will tend to do increasing amounts of their retail online – with little demand for new shops.

**Issue 4:** Is Policy E4 justified in terms of how it relates to tourism-related development in the Green Belt; and should it include specific provisions to support the expansion of the Lee Valley White Water Centre which lies outside the District?

### Hearing statement points

- i. The Epping Society believes there is much the Council could do and cheaply, to enhance the District's tourist industry. This could start with better signage & information for visitors and marketing for local events. However we do not see the relevance of the proposed support for the LVWWC; the Lea Valley is already funded by a range of other bodies. What will be the likely benefits to our District area?
- ii. If "accommodation" in E4 A(i) refers to visitor centres it should respect the openness of the MGB and be of a scale so as not to create new developed sites. If it refers to residential accommodation The Epping Society opposes this policy.

## **Matter 13 : Transport**

**Issue1:** Has regard been had to the Mayor of London's draft Transport Strategy and London Plan in proposing Policy T1; and are its provisions clear and effective?

1. Does this policy take account of the strategic transport objectives in the Mayor of London's draft Transport Strategy and London Plan? Would the policy support the objectives of these documents in respect of transportation and have any specific conflicts been identified? (Reps TfL).

### Hearing statement points

## Central Line

- i. The Mayor of London's 2018 draft version of his Transport Strategy echoes many of the Local Plan's aspirational policies, but The Epping Society has to question how effective local applicability of the practice involved might be. For example, the opportunity for modal shift, given the District's roads & topography regards cycling, our already weak bus network and a lack of existing and seemingly future 'commuter' parking, particularly at railheads known to service a wide catchment area.
- ii. There is a mismatch between policies in the Local Plan and the London documents. This is crucial since so much development in the EFDC area is caused by out-migration from London and depends on the present/future capacity of the TfL Central Line. In the Mayor's Transport Strategy, several tube lines are specifically targeted for investment and improvement, but not the Central Line (Table 55). Similarly in the TfL Business Plan 2018, page 59, there is reference to improvements planned on several tube lines, but the Central is absent. Again, lastly, the TfL Budget 2018, p34 has 5 tube lines as Priorities, but not the Central line.
- iii. Further, the Strategy is a political document – it has several pages protesting against Central Government's decision about Heathrow; also much extolling the benefits of the Elizabeth Line whose completion date is still unknown - is such a political statement a sound basis on which to rely particularly in the claimed future relief/demand transfer of existing rail services including the Central Line ?
- iv. The Epping Society also has doubts about the assertions made about the potential capacity of the Central Line – an crucial requirement for the sustainability of the Local Plan. In his representation, Mr. Carr promises a 25% capacity increase, many more trains per hour, station capacity etc. Yet among our members and in the community we have several TfL staff who work on the Central Line, their unanimous opinion is that these projections are unrealistic. Sadly, but understandably, they wish to be anonymous. For example, the cost of a completely new signaling system would be tens of millions of pounds, and "there's not enough track beyond Loughton".

2. Should Part A, perhaps A(ii) make reference to the desirability of promoting safer routes to school and to establishing an attractive pedestrian environment around schools to encourage travel by non-car modes? (Reps ECC).

### Hearing statement points

#### Other transport issues

a/"Safer routes to school" would be highly desirable but EFDC/ECC have a poor track record in this area eg the tiny proportion of students who now cycle to the new secondary school in Epping. Despite the promises made during the planning, local roads are very heavily congested (occasionally blocked) by parents doing the school run. In discussion, they "will not let their kids cycle because the roads are too dangerous". (Many of these drivers wait with their engines running and no measures have been taken by Councils to monitor/reduce, ref. Air Quality)

b/ In the EFDC/Arup 'Part A' document covering Transport/Rail and Underground, the Epping Society would point out that the majority of data quoted is from 2014 (i.e. 5 years out of date). To what extent can the contents be regarded as applicable into the plan implementation period?

Also, we can find no reference to any "sources" including passenger focus/interest groups. These groups are sources of information on key issues affecting present/future passengers that include shortcomings of existing public transport network planning and operations/operators, effectiveness of contingency plans implemented during periods of disruption and priorities to be addressed designed to retain existing levels of ridership and to achieve modal shift from private to public transport in the future.

c/ To what degree can the future parking strategy be identified/relied upon as a key factor in achieving modal transfer to public transport and improving local environments? Concerns include need for/apparent lack of an effective 'Memorandum of Understanding' (MoU) with key agencies including public transport and parking agencies, impact assessment of changes to contents/recommendations in key planning documents since their publication such as TfL 'Fit for the Future' and proposed changes to future parking strategy at (LU) stations to provide for residential accommodation. In 2016 TfL requested that "any future applications affecting car park capacity in the vicinity of TfL stations should be subject to full consultation with TfL"; we are unclear as to where responsibility rests in the event of a

failure to agree when such consultation takes place, nor whether all the parties with a legitimate input into the final decision on future parking strategy have been identified and agreed.

d/ "Rail-heading" to stations/their environs, including by those who live outside the EFDC area is a current issue of concern and again raises the question as to the identification of key parties involved with local plans affecting 'catchment areas' outside the EFDC area and the impact that their decision-making will have on generating additional demand for (peak period) rail services serving the EFDC area. Traffic congestion affecting towns like Epping, Loughton and nearby Harlow is already increasing; to what extent have EFDC sought to agree an MoU with 'relevant' agencies in respect of containing future traffic congestion and ensuring that measures designed to achieve modal switch away from the private car are both achievable and sustainable at a time when factors including financial support and operator stability and commitment in the longer term are concerns?

3. Is it clear what scale/type of development will be required to submit a Transport Statement or Assessment in accordance with Part D?

Hearing statement points

Other transport issues

The Epping Society calls for continuous assessment of the actual outturns compared with assessments that formed the basis of planning consent so that systematic errors of estimate can be corrected in future plans and developments.

4. Are different parts of this policy intended to apply to development of different types/scales? If not, why are Part C and Part F, which both concern the circumstances in which development will be permitted, separate? Should amendments be made for clarity?

Hearing statement points

Other transport issues

The Epping Society considers it important to establish sustainable habits among new residents as soon as they occupy new developments. Parking, wheelie bin stores etc. should be responsibly managed and enforced from the beginning and commuter parking should be restricted ab initio.

**Issue 2:** Will Policy T2 be effective in protecting the land required for future transport schemes from development? Is it necessary to list the particular schemes for which land is required to be safeguarded? Is the relevant land shown on the Policies Map?

Hearing statement points

- i. We consider it to be essential. If the District is to continue to develop, so must the infrastructure; Council need to safeguard the space for this. Unfortunately EFDC has a poor track record – eg giving Planning consent for house extensions literally up to the pavement edge at the Bell Common/Ivy Chimneys traffic lights, one place where traffic mitigation is already needed, never mind provision for the future (and this in an AQMA!)
- ii. A local car repair facility was closed recently in Bower Hill partly due to the proposals to convert the site to residential development. As a result the only car repair workshops on the edge of the town are remote from TfL. This suggests that EFDC LPSV has already had undesirable effects on sustainability.
- iii. Public transport in particular depends on factors that provide an effective interchange with other modes/destinations. Examples are access/egress to/from railheads, provision of bus stops and stands at termini clear of other traffic flows and where appropriate public transport priority over other traffic. These require land and other supporting measures where appropriate in order to maintain regularity/reliability particularly when seeking modal transfer from private to public transport. Existing transport 'hubs' in the EFDC area often do not address this satisfactorily and it is unclear as to the responsibility for achieving improved/effective public transport that will be essential if modal shift is to be achieved – and maintained to satisfy demand from within the EFDC area and beyond.

**Matter 14 : Infrastructure and Delivery**

**Issue 1 :** Will Policy D1 be effective in securing the infrastructure necessary to support development before it takes place?



1. Is Policy D1 clear that any infrastructure necessary to support a development must be provided up-front/in time to serve the development?

Hearing statement points

The Epping Society appreciate that this is a difficult question, however we believe the Council should make it certain beyond doubt that infrastructure improvements must be delivered up-front/in time for the new residents to experience satisfactory arrangements. Failure to do this might encourage new members of the community to embed undesirable behaviours, eg driving, rather than using the bus, because the enhanced bus services have yet to be established. Also potential house-buyers may be put off if they see the existing signs of an infrastructure already under significant stress – eg parking is not available for them to visit estate agents. Therefore we would like to see the Council adopt an absolutist approach to this – the infrastructure must be a sine qua non.

2. Should Part A and the relevant supporting text explain that infrastructure and services for which contributions etc. could be sought might be derived from made Neighbourhood Plans as well as from the Infrastructure Delivery Plan? (Reps Chigwell PC).

Hearing statement points

Yes, EFDC must work in effective partnerships with local councils and other bodies. To fail to do so will further damage the Council's credibility, and also deprive themselves of local detailed knowledge.

3. In Part B, how would a potential developer find out specifically which items of infrastructure might be required as part of their scheme? Is this clear?

Hearing statement points

- i. It needs to be absolutely clear. In some cases the mitigation funding might be indirectly linked to a particular development, for example a new sizeable housing development might require action at a road junction a kilometre or more away.
- ii. We were alarmed to hear that developments across the District are to be required to contribute to funding improvements to junction 7 of the M11 when the issues arising from it relate largely to Latton Priory and other Harlow areas; developments elsewhere need all the infrastructure funds they can get to make life even tolerable for the additional residents.
- iii. We were disappointed to learn during the March inspection hearings that the financial contributions expected are yet to be defined by EFDC, were not known at the time the LPSV was submitted for examination and will not be available until 15 April 2019.
- iv. Part A could be read as requiring a new development also to resolve pre-existing inadequacy of infrastructure provision. Local residents consider this is a problem with schools, healthcare, transport and traffic and other aspects of public provision. This should be clarified.

4. In Part C, is it intended that all the clauses (i)-(iv) should apply for an exception to be considered on viability grounds? If Part C(i) did not apply, would this risk development proceeding that could not be supported by infrastructure? Would this be justified?

Hearing statement points

- i. We draw attention to the subjective quality of D1 C(i) and the opportunity for EFDC to grant development despite inadequate infrastructure on the grounds that additional housing outweighs all other considerations. The Epping Society would not accept such a proposition and we ask for clarity as to the decision making on this point.
- ii. Our stance is simply that development without infrastructure (other than very small scale projects) would be disastrous. The area's infrastructure is already running well above capacity in pretty much every respect; the Council is enormously behind in mitigating the existing problems. Development without infrastructure should simply be rejected, as a matter of policy.
- iii. From the point of view of developers, they are frequently found to be over-optimistic in their publicity; we can quote a recent Epping development, described as within 500m of a primary school. Yet that school is constantly over-subscribed. Any school places given to new

residents displace the existing population's children; but the Plan has Aims about quality of life!

- iv. We are alarmed at the per dwelling cost of the IDP estimates, and not all of the items even have estimates. The average is very high and it would be unsound to adopt a Local Plan in which substantially all developments were unviable as the necessary infrastructure might not be provided on a timely basis or at all.

**Issue 2** : Are the requirements of Policy D2 concerning Health Impact Assessments (HIA) justified, effective and consistent with national policy?

1. Is it clear in the policy wording and the supporting text that the purpose of HIA concerns wider health and well-being matters beyond health infrastructure?
2. Essex County Council has indicated that the Department of Health does not issue guidance on HIA. Do the references within the policy require updating? Is specific guidance on the matters to be covered required within the Plan itself?
3. What type of information is expected in an HIA and how will developments respond to their recommendations?
4. Is there value in requiring HIAs for allocated sites, or should the health impacts already have been assessed through the plan-making process?
5. Is the threshold for the production of an HIA at 50 dwellings proportionate?

Hearing statement points

- i. There are a range of HIAs the Council could use off the peg, or dredge for ideas. The Epping Society believes that an HIA should go beyond the primary factors – access to GPs, dentists, hospitals, services like elderly care, district nursing, which must have capacities to accommodate existing and new residents; but should also include secondary factors like close access to sports, recreation, cultural and religious activities, green spaces nearby, as well as major recreation areas such as Epping Forest and the Lea Valley. These sorts of things have been shown repeatedly to influence people's health, well-being and happiness, not just physically, but also in terms of stress and mental health. The Epping Society consider that any development (beyond a small-scale threshold) should require an HIA as part of the design/planning process.
- ii. We draw attention to the way connecting with nature offers a new approach to mental health care. This is described in a report at <https://www.gov.uk/government/news/connecting-with-nature-offers-a-new-approach-to-mental-health-care>. Encroaching on the Metropolitan Green Belt and other open space for development increases stress and reduces access to the relaxation necessary for all Londoners and local people in an ever more stressful, highly developed and busy part of the world.

**Issue 3** : Is Policy D3 justified in requiring developers to fund improvements to utilities infrastructure where capacity issues exist?

1. Is it correct that utility providers have a duty to provide services to new development? If so, is Part B justified?

Hearing statement points

Existing capacity shortfalls should not be funded by new developments or not more than proportionately to the numbers of users as a whole who enjoy those services. In the case of utility providers we believe they are under obligations to provide services, their profits are limited by regulators in a way that reflects (rightly in our view) their expenditure on capacity and accordingly they should fund upgrades and charge users the right prices for services provided in the years ahead.

**Issue 4** : Is Policy D4 effective?

1. For the purpose of Parts B and C, how will a developer know specifically whether and what community infrastructure is required as part of the scheme?

2. In relation to Part C, is it necessary to define strategic, larger and smaller developments, or is this clear elsewhere in the Plan?

3. What is the purpose of having separate criteria in parts G and H? Are they intended to apply to different types of development? Why is marketing required in Part H but not Part G?

Hearing statement points

- i. In certain cases the effect of Part C would be to isolate the new development from the existing community which we would deplore. Integration should be encouraged with facilities for all people in a town not exclusively or isolated for only newcomers (or existing residents) exclusive use.
- ii. The Epping Society consider that clarity here is crucial for all concerned. The community should be involved in a transparent and demonstrable way in how all aspects of infrastructure are to catch up with existing demand and meet future needs. Developers need to clearly understand what is expected of them, before they submit for PP, and the Council should make delivery a legal requirement in those projects. Funding should not be dumped into a general fund but transparently directed at identified projects.

**Issue 5** : Are Policies D5-D7 justified, effective and consistent with national policy?

- iii. D5 A: we would resist any financial contribution by EFDC to achieve the promotion it mentions.
- iv. D5 B: we support and consider it justified in an area with such a large MGB and SAC as well as heritage assets and market town communities.
- v. D6: If Neighbourhood Plans are to be limited to supporting the LP policies it is difficult to see how much value they can have. For instance:
  - a. EFDC has decided to outsource QRPs to a commercial concern and limit their activities to sites of more than 50 homes. Does that mean a NP proposal might have a locally based QRP which has a wider remit would be rejected as in conflict with the LP.
  - b. EFDC has not adopted a design guide for Primary High Street frontages or Conservation Areas. Does that mean if an NP proposes a design guide it would be rejected?

Hearing statement points

- i. This could significantly limit the concept of localism inherent in NPs.
- ii. D7 we consider this wholly inadequate. The last Monitoring Report has major areas with no data and annual reporting some months after date is of little help for developers to know the state of development targets, approvals and delivery and for the public to hold EFDC to account.
- iii. The Epping Society calls for quarterly updates of key statistics to cover, for example, the target numbers of houses by housing type, applications, approvals and completions. Alongside that all key IDP elements should be reported on state of capacity, committed funding, start and planned delivery date and actual cost and delivery.