



[REDACTED]
[REDACTED]
4 October 2024

**Response from the Epping Society to
the Epping Town Council Neighbourhood Plan (dated August 2024)**

Dear Sir / Madam

The planning subcommittee of the Epping Society, after consideration, wishes to make the following Comments.

The Epping Society is supportive of the Neighbourhood Plan (NP), both in general and in many of the stated intentions. We think the Vision and Aspirations are helpful; and concur enthusiastically with repeated assertions that “infrastructure should precede new development”; also the reaffirmed concern with traffic, parking and pollution. We believe that many aspects of the NP are in the best interests of the Town, and of present and future residents.

We express some doubts about the process by which the NP was created. There has been a lack of transparency. The public do not know who was in the group, how were they chosen, what qualifications, expertise etc were sought? Documents such as agendas and minutes seem not to have been uniformly available. Publicity was limited until recently, so many people will have been unaware of the NP.

The Epping Society raises a number of significant issues about the NP as are here presented:

Outdated information - a few examples include projections about South Epping (SEMPA), which is already beyond Master Plan stage, (as known before NP release date), lacking many of the provisions “required” in the NP. Community Issues are we think based on a 2015 survey. There is no Police Station. The town map on the EFDC link is about 15 years old, missing several large new developments.

Omissions - as examples - there is no Design Guide in Annex C, as stated on an earlier page. There appear to be no references to dental services.

Typographic errors, which should have been resolved before publication; for example – ETFC in the glossary, is surely Epping Forest District Council, EFDC?

Unfeasible projects – especially the Epping Ongar railway and the extensive remodelling of Epping tube station and approaches. These are only realistic if huge sources of funding become available. The NP should reflect these as such, perhaps with footnotes; otherwise the public might be misled into thinking these projects will be delivered imminently.

pto

2.

Confusion about the relationship between the Neighbourhood Plan, EFDC's Local Plan and national NPPF regulations. Some paragraphs and Policies refer to these; others do not, a legal team might ask about those. There are also "local development plans" referred to, what are these?

Also there is a lack of clarity about the legislative basis of the NP. Are the Issues and Aspirations part of the Plan, or maybe just the Policies? How much of the rubric is to be considered statutory? As the NP will be a material consideration in any planning application, it is important to not leave any uncertainties.

Number-checking is needed – example - "705 homes". We cannot get this number from any other data in the Plan, (beyond para 2.6).

Likewise, there is a Local Plan requirement for 40% "affordable" in all larger housing developments; but that very same paragraph gives the St John's Road development as 46/184, which is 25%. The 40% was lifted for several sites by EFDC under a "viability" application by Qualis, quite a while ago; the NP should make this clear.

S106 payments – the references leave questions unanswered. How likely is the Town Council to receive these funds? At what stage are payments made – approval, or completion? We understand that these payments can be dependant on the signing off of a Neighbourhood Plan – if so, this should be explicit. Also it would be highly relevant to have an indication of how ETC might spend such monies.

There is a serious lack of clarity in a few areas. The Plan should be reviewed with a "worst case scenario" in mind, e.g how would a developer deal with this? A very important example is in Policy 14 which states that the developments which will not be permitted are those "contrary to the Essex Design Guide AND have a detrimental effect on the lives of people" (our capitals). This implies that a proposal will need to breach BOTH of the two clauses before it will be refused; which is surely not the intention?

In view of the above, the Epping Society reluctantly Objects to the Neighbourhood Plan in it's present form. It is in places inaccurate, confusing and even misleading; we consider it might lead to future difficulties and complications in our community's planning activities. We fervently hope that suitable adjustments can be made to rectify our concerns.

We would be pleased to be involved in any next steps. Our more thorough, page -by-page analysis of the Plan can be made available on request.

Roger Lowry, Planning Committee, the Epping Society