



Epping Neighbourhood Plan 2024 – the Epping Society detailed response

The Epping Society have carried out a detailed page by page review of the Epping Neighbourhood Plan (NP) as shown over the following pages.

In view of the number of errors and missing information, the Epping Society reluctantly Objects to the Neighbourhood Plan in its 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.

Any questions then please contact info@eppingsociety.org

Epping Town Neighbourhood Plan - Regulation 16 submission Version August 2024

| Page | Para. | Comments |
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| | | Foreword |
| 2 | | <ul style="list-style-type: none"> • “There is insufficient space to build the required number of houses in Epping without building on green-belt land.” – an encouraging stand made. • Reference to congestion, road & rail, transport investment -ditto • “Option” for South Epping is outdated, already determined. |
| 3 | | <ul style="list-style-type: none"> • “705 dwellings” – figure is not clarified later; can’t see the Maths • Total figure was determined by Local Plan Inspector – NOT local needs, and not entirely to protect the Forest. • New health hub - a welcome recurring theme; but now NOT to be at South Epping • Improved car parks ?? • Specialised housing – welcome; e.g. EFDC has a policy against converting bungalows, but it is happening regularly. • Affordable homes – but developers have a green light to waive that! • Station improvements – yes please, but how to enact? • “Epping’s future requires an effective and innovative solution before further growth is set in motion” – agree, but how? • No mention of the importance of retaining the green setting of Epping |
| | | 1. Introduction |
| 4 | 1.1 | <ul style="list-style-type: none"> • “emphasises the need for improvements to the road and rail connections before major new developments can take place.” – agree, but how? |
| 5 | | <ul style="list-style-type: none"> • Proposed Green belt boundary, useful & agreed in Local Plan; but authority with EFDC who happily change it |
| 6 | | <ul style="list-style-type: none"> • Epping Upland has a separate neighbourhood plan • Nat.Gov seems about to sweep away NPPF GB/housing regulations • Travel to work patterns (2011) have changed since Covid |
| 6 | 1.8 | <ul style="list-style-type: none"> • ‘bordered’ to the east by the M11 |
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| | | 2. Epping: the big picture |
| 8 | | <ul style="list-style-type: none"> • What residents like – these are important • Big Issues to address – was there a survey? When? Methodology? Outcomes published? However generally agree. • But need to add dental services & nursery / primary places |
| 9 | | <ul style="list-style-type: none"> • Likes & issues – how decided? • “A new vibrant community will be delivered at the south of the town. This will integrate fully and complement the existing community.” Very subjective. Define “vibrant”; and given likely facilities at South Epping, seems highly aspirational! • Impact on Forest & mitigation measures – how? Bear in mind the promised CAZ if we do not achieve these! |
| 9 | 2.9 | <ul style="list-style-type: none"> • The EFDC Local Plan has now been adopted so this paragraph needs to be updated. Only the Epping South changes to the green belt boundary were made. |
| 10 | 2.11 | <ul style="list-style-type: none"> • New housing & infrastructure – another mention • Design gets a mention |
| | | 3. Vision and aims |
| 11 | 3.4 | <ul style="list-style-type: none"> • Consider extending the conservation area • Yet more mentions of “without damaging the environment”; access to transport; health hub; improve transport & parking etc. – all supported (but how?) • Do we need more retail outlets when those on the High Street are struggling? • More cultural offers required |
| | | 4. The Forest, Green Belt & Natural Environment |
| 13 | 4.2 | <ul style="list-style-type: none"> • “Give communities a stronger voice” - very welcome idea. Councils should be aware that presently the public opinion is that “they do whatever they want, regardless”. • Affordable housing, another reference – good. <p><u>Policy 1 Protection of the Forest & Greenbelt –</u></p> <ul style="list-style-type: none"> • how will the Epping Greenway be delivered? No mention in the text. |
| 14 | | <p><u>Policy 2 Protect and Enhance open space within the Parish</u></p> <ul style="list-style-type: none"> • good to see mentions of town centre grass strips (a long-standing & frustrating concern of the Epping Society) & also Theydon Grove pond. We must look after what we already have, else the possible impacts of the new are counteracted • The grass strips are on <u>both</u> sides of the High Street, not just Church to Tesco. • 171 TPOs seems low given the location of Epping. Also these do not offer sufficient protection eg the proposed Redwood felling at Tidys Lane. • No mention of the ‘Epping greenway’ – this should be included in the designated area • No mention of the GCN pond in town centre development |
| 15 | 4.5 | <ul style="list-style-type: none"> • Acknowledge that working with Forest authority can be very problematic |

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| | | <ul style="list-style-type: none"> Greenways & signing – interesting, potential useful; not too expensive? |
| | | <p>5. Epping’s growth & development</p> |
| 16 | 5.2 | <ul style="list-style-type: none"> Photo – most of the time there are many more cars. Could have been used as a subtle indicator of failure of EFDC’s Modal Shift. Outdated – we know that Epping South is very unlikely to have a “local centre”; although the release of Public Consultation has been postponed (Sept 2024)...? Also refers to “new roads” – where? Alternative sites are “unacceptable” – agree, but how to enforce? |
| 17 | 5.6 5.7 5.8 | <ul style="list-style-type: none"> Improvements at station – is a recurring topic in Local Plan etc; but no action yet Library – only c. 11 homes. Large site. N.B. St John’s Road project is 46/184 = 25% affordable homes; NOT 40%; is this Plan already admitting defeat on the 40 % rule in Local Plan? How do we ensure the new houses “meet local needs”? How will development on open & green spaces be opposed? but remember the CAZ threat, if this fails. <p><u>Policy 3 Development Proposals;</u></p> <ul style="list-style-type: none"> again “infrastructure first”, but EFDC not doing this. |
| 18 | 5.9 5.10 5.11 5.12 | <p><u>Policy 4</u></p> <ul style="list-style-type: none"> Sustainability (already in LP & NPPF?) Where does Half Moon Court originate? Pub name? Good to see reference to Design, but vague Health hub again – good, but where? Needed to the South of town. No dental? “Currently available car parking”. But other parts of NP speak of increased and new car parking. Many new residents without car space will try to use the awful multistorey as a car space – indeed EFDC are giving parking vouchers to help sales at ex-Office site! “Improvements in parking at Cottis Lane” – no, it is the same number, see above. <p><u>Policy 5</u></p> <ul style="list-style-type: none"> SEMPA has already ruled out most of the desired provision. <ul style="list-style-type: none"> Reference to densities – we would want Green Belt incursions minimised by higher densities where possible. Concern that the thrust favours developers / builders. Last sentence – “advanced infrastructure”, Qualis do not have a good record on this. Aspiration will need teeth. “Avoiding ground floor residential”, but EFDC are already allowing this eg Revival Court in High Street. The developer is owned by EFDC so how does that impact planning consent? |
| 19 | 5.13 | <ul style="list-style-type: none"> Identification & protection of trees & hedgerows on development sites – will that be enforced? |
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| | | 6. Accessibility & connectivity |
| | | This section is mainly aspirational as it is outside the control or influence of this NP yet continues to be a big issue locally and a source of frustration. Additional development without infrastructure will only make the matters worse. It is also the largest section of the NP. |
| 20 | | <ul style="list-style-type: none"> • Photo – station is never this empty when I use it! Have had to queue > 5 minutes to get out. • Capacity & potential of tube is rightly queried by the NP. Yet the Local Plan assured us that this would not be a hindrance to growth. Our information is that any large expansion is remote. |
| 21 | 6.7 | <p><u>Policy 6 Epping Station</u>; also Community Aspirations Transport</p> <ul style="list-style-type: none"> • Bottlenecks, include Ivy Chimneys Road / Brook Rd / Bridge Hill. Yet this will be the only access for South Epping. Is no-one thinking ahead? • ‘Rat runs’ along Hemnall st etc are also an issue |
| 22 | | <ul style="list-style-type: none"> • Agreed repeated points about infrastructure before developments. Eg new road for South Epping – but where & when? • Bell Common traffic lights – extra lane; has been discussed so many times. This is our worst polluted area (AQMA); action when? Depends on Forest authorities (see para.4.5) • Table Accessibility • Aspirations – explore pedestrian priority areas & Greenway footpath connections – both require additional pedestrian crossings eg on Hemnall street & Stonards Hill – in particular to safely cross to the recreation ground. • 20 mph near playgrounds too eg Stonards Hill & in residential areas eg Theydon Grove • Infrastructure requirements to support South Epping need to be in place before development starts • Improved footpaths but also new PROWs to protect existing access to green fields. |
| 23 | | <p>Map 1 Proposals map for Epping Parish</p> <ul style="list-style-type: none"> • Greenways. Need detail please? See ECC Local Nature Recovery Strategy (LNRS). • Car-free near schools / 10mph? Timings throughout the day? |
| 24 | | <ul style="list-style-type: none"> • Improved pedestrian facilities need to include new pedestrian crossings • More street tree planting • Cottis Lane parking; it is built, not proposed; also it is not new parking spaces as the number of spaces exactly replaces existing parking spaces. • Park & Ride again (see above). • Policing of parking – currently erratic / absent. Ditto idling engines. • Parking control is “initiated by residents requests”. Not how it works – the NPP inform you, with a very brief window to raise an objection; which has to be strong and near-unanimous. Reasons given by NPP for Bury Road restrictions were not correct. • More mention required of developments outside Epping which impact accessibility & connectivity eg Thornwood, North Weald & Latton Priory. |

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| | | <p><u>Policy 7 Walking, cycling, car parking.</u></p> <ul style="list-style-type: none"> • Confusion about different users of station • EV chargers at ALL developments? Extensions? • Weston Homes at Thornwood is advertising a 6 minute drive to Epping tube station! |
| 25 | 6.12 6.14 | <ul style="list-style-type: none"> • More on Greenways; but these are not “new connections”? Interesting idea. • Car parking ‘hotspots’ – what is this based on? • New pedestrian crossings too <p><u>Policy 8 Paths to countryside</u></p> <ul style="list-style-type: none"> • Schools 20mph. Also playgrounds eg Stonnards Hill. Please. Timing? Enforcement? (Aspiration is on p.26) • New pedestrian crossings & PROWs |
| 26 | 6.19 6.21 6.22 | <ul style="list-style-type: none"> • More buses for South Epping – good. Need to move bus stops too, see time / radii diagrams on SEMPA map. • Park & Ride again • One sentence – need more detail. How, where, when? • Idea of “deficit”. ETC will be aware that changes to parking times / tariffs in multistorey have already damaged community life – eg Dance Class in the evening. This despite Qualis promise that charges would be broadly in line with existing. Needs redressing. Why should community suffer because of poor concept / design / construction / operation of new car park? • “Residents views” on parking restrictions. No. See page 24 comment |
| 27 | | <ul style="list-style-type: none"> • Ongar rail, also Park & Ride again. Great theories. |
| | | <p>7. Epping Town Centre</p> |
| 28/9 | 7.2 7.7 7.8 | <ul style="list-style-type: none"> • High Street, upper storeys -good way to intensify use of centre; or should we encourage office use? Planning control, and issues of sewage overload (also parking) need careful address. • Sort term shop use needs to be effective • Agreed <p><u>Policy 9 Epping Town Centre</u></p> <ul style="list-style-type: none"> • A big issue here is that Councils in general seem unable to control / influence changes in shop use, hence number of coffee outlets (has anyone counted?). Reference to Coopersale shops – but there is no mechanism. • Community aspirations - Reference to <u>Essex?</u> Design Guide in Annex C; but cannot see – needs clarification |
| 30 | | <p>Map 2 Epping Town Centre</p> <ul style="list-style-type: none"> • map stretches too far South; • also why St John’s Road? |
| 31 | 7.10 | <ul style="list-style-type: none"> • Need to identify ownership eg of grass verge along high street currently parked on <p><u>Policy 10 Sustaining and Enhancing Epping Town Centre</u></p> <ul style="list-style-type: none"> • temporary shop use would be nice <p><u>Policy 11 Shop Fronts improvements</u></p> |

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| | | 8. Business & employment |
| 32 | | <ul style="list-style-type: none"> Brief section given its importance <u>Policy 12 Employment</u> <ul style="list-style-type: none"> Details of LSCC – ToR etc? |
| | | 9. Local Facilities for Health, Arts, Culture & Recreation |
| 34 | | <ul style="list-style-type: none"> No reference to South Epping development losing the use of a playing field big enough to eg play football. <u>Policy 13 Enhancing Social, Sporting, Play, Cultural and Community facilities</u> <ul style="list-style-type: none"> Facilities, add pubs & social clubs. More emphatic? No mention of Epping Bowls club Aim to have clubs within walking/cycling distance of town |
| 35 | 9.4 9.6 | <ul style="list-style-type: none"> Aspirations Recreation Library relocation needs to retain current footprint of existing library Cinema / arts area idea is worthwhile. SEMPA – school is “expected”. Should be “required”; a sine qua non. What is the significance that the Plan specifies a “site”? |
| | | 10. Enhancing the lives of local residents |
| 36 | | <ul style="list-style-type: none"> Speed limits near playgrounds & residential areas eg Stonards Hill & Theydon Grove The bungalow issue – see note on page 3 Bear in mind EFDC Planning problems following their Inspection. Table 2 Comparison of demographics of Epping residents groups to Essex & UK <ul style="list-style-type: none"> Age table. Contrary to that provided for the Local Plan. Not old! Date? |
| 37 | 10.3 | <ul style="list-style-type: none"> Especially in the town centre developments <u>Policy 14 Protecting Residential Amenity</u> <ul style="list-style-type: none"> Lack of clarity in this policy may allow developers carte blanche approval “detrimental effects”. How to define / enforce? The Epping Society has frequent spats with EFDC where residents say a new development will do just that (especially overlooking); but EFDC often over-rule. <u>Policy 15 Bungalows, basements and garages</u> <ul style="list-style-type: none"> bungalows see p. 36 & 3; why the “down” on basements?; detached garages – supported. <u>Policy 16 Sustaining and enhancing Coopersale</u> |
| | | 11. Heritage, Historic Buildings and Public realm |
| 38 | | |
| 39 | | <u>Policy 17 Protecting the Parish’s Heritage Assets</u> <p>Community Aspirations - Heritage</p> <ul style="list-style-type: none"> Good to see Theydon Grove and Albany Court included. In the case of the latter, we are a bit late as the new Sports Centre will loom over the top of the street. Council may seek support from the Twentieth Century Society. NB there is no Police Station |
| 40 | | <ul style="list-style-type: none"> ETC using a Design Panel – needs detail. |

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| | | <ul style="list-style-type: none"> • Review of Conservation Areas – agree. • Theydon Grove pond is correctly shown within the conservation area map • Need to include GCN pond too Annex D |
| 41 | 11.10 | <ul style="list-style-type: none"> • Can NP work to discourage use of shutters by High Street businesses. Creates an oppressive atmosphere – almost expecting ASB? |
| | | 12. Sustainability |
| 42 | 12.3 | <ul style="list-style-type: none"> • Ironically, photo shows area where vehicle incursions frequently damage grass verges! • S106 money for community benefits; sounds very hopeful. Will they be made to pay? How publicly accountable will this be? • More tree/hedge planting especially in town centre developments <p><u>Policy 18 Sustainability</u></p> <ul style="list-style-type: none"> • o.k., but could be more emphatic And Mr Lowry is delighted to see reference to grey water systems; Australia, California, Jordan Epping next? • Why just CO2? Outdated science. • SuDs & other green spaces need “lifetime” maintenance plans |
| | | 13. Making it happen |
| 43 | | <ul style="list-style-type: none"> • Infrastructure first importance again • Railway to Ongar again • Review of well-used informal footpaths, with intent to make public FPs • Increasing accessibility to Bell Common, walkway over mudbath • Master Plans – bit outdated, as SEMPA already has a MasterPlan. |
| | | <p>Action Plans Generally these need numbers to identify them Are they in any particular order?</p> |
| 44 | | <ul style="list-style-type: none"> • Action Plans – no reference to CofL, who will need to be involved in some, eg junction remodelling • First action done ie revised GB boundary agreed in Local Plan • Agencies listed should show “priority of responsibility”, especially where one body has an effective veto. • Action Plan needs to mention Library • New Health hub proposed to be at St Margarets; but is needed more in South of town (also reduces travel) • Reference to EFDC Offices Master Plan – is outdated, ¾ built, • SEMPA masterplan – consultation results delayed |
| 45 | | <ul style="list-style-type: none"> • Extend Oyster to Harlow too, we get quite a few commuters that way • Multiday tourists – hotels?? • More pedestrian crossings • NB Epping Art Society has folded |
| 46 | | <ul style="list-style-type: none"> • Support declutter of High St, incl one huge café sign, Marlos, which blocks half the pavement |

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| | | <ul style="list-style-type: none"> • Demise of Epping Hall? • Day nurseries at S. Epping – not on Masterplan. Outdated • Ditto at St John’s Road – not on approved Plan. Outdated • More pedestrian crossings |
| 49 | | <p>Annex A</p> <ul style="list-style-type: none"> • use of this? Some context required |
| 50 | | <p>Annex B</p> <ul style="list-style-type: none"> • It would be useful to have nearby developments for reference which will impact Epping eg Thornwood, Latton Priory |
| 51 | | <p>Annex C</p> <ul style="list-style-type: none"> • does not contain a <u>Essex?</u> Design Guide reference. See p.28 • Area Characters – some groupings are curious, eg 15. But not part of NP |
| 52 | | <p>Annex D</p> <ul style="list-style-type: none"> • What are the red junction lines? • The GCN pond needs protection in the new Springwood Grove development |
| 57 | | <p>Annex H</p> <ul style="list-style-type: none"> • Mention blue plaques? |

Epping Society

10.10.24