

Epping Neighbourhood Plan

Regulation 16 Submission Version August 2024

Abbreviations used: NP = Neighbourhood Plan, LP = Local Plan of EFDC, EFDC = Epping Forest District Council, ETC = Epping Town Council.

HMG guidance on the production of NPs has the following to say:

- Local people to be consulted

I question the selection of people who worked on the current NP. Who were they and how were they selected. I doubt the scale of publicity generally has been adequate. ETC could have emailed everyone whose email address they have, they could have circulated information to every household and every community organisation active in the town.

- The parish council gets 25% of S106 proceeds.

By delaying the NP these funds may be lost and the major developments in the town – the biggest for decades – will go ahead before the NP is in place. A lost opportunity

The NP does not give any commitment about how such funds will be spent.

- There is meant to be full transparency.

It does not appear that all meeting minutes and papers and all emails to and from all participants are available online for examination.

- EFDC has to run a referendum on the proposed NP
- What plans has ETC for publicity and public meetings on the final document and referendum.

I have not seen any invitation for members of the public to participate in the development of this proposal. Was there any communications plan? When?

How were the participants selected and who were they.

Who initiated the project.

Was this plan unanimously supported by the group/committee and on what date.

What research was done to ascertain the views of the public.

What publicity has been given to this consultation. I did not know about it until Epping Society asked me to review and none of my friends know either.

It is very important to know if the narrative, aspirations and/or the policies are intended to be the “NP” or all of them. The NP may affect future planning applications and EFDC and ECC spending plans. The NP will be a material consideration in planning decisions so it is important that the public and developers alike know what is the status of these different parts of the whole.

As an overall comment I judge the document to be so poor I think it should be completely re-written. I repeat the request to know if the NP committee or group has approved this document and when. Are the minutes of the meeting online and was it properly constituted with prior agenda, prior circulated draft NP and was the group professional advised or guided on the effect of the proposed NP.

The Epping Town Council website was accessed at 17:18 on 18 October 2024. The first page states that the latest version of the Neighbourhood Plan was dated November 2023. I have been

working from the version dated August 2024 but I was unable to find in it the deadline date for responses. I searched the website for the words “consultation” and “Regulation 16” but there was nothing found. These circumstances show the consultation process to be defective.

P1

The Contents refers under section 3 to Vision and Aims. It refers to survey findings but there were none in the referenced pages. Was any survey done, when and where is it.

The Vision & Aims does not mention design so it is not apparent how the character of the town will be maintained or enhanced. Developments in the town since the LP was adopted have been wholly and significantly in contrast to the market town image Epping has historically aspired to.

I have scanned the Contents page but I could not see how the public can respond to this document, what publicity it is to receive nor the means by which it is to be adopted.

P2

The foreword suggests the main or dominant reason for the NP is to manage the impact of additional housing. I suggest the objective should be wider and relate to development and design of the public space throughout the town. It should refer to commercial premises, for example.

It is not true that the number of proposed houses was reduced from 1300 to 705 “to protect Epping Forest”. The reasons were more complex than that and the 705 is not a limit – there might be more.

Reference to “local wishes or needs” is seriously misleading. The EFDC LP was developed to please the Government and not because of either local demands for additional housing nor any needs that could be described as local. Local people, not least The Epping Society, submitted voluminous commentary and suggestions for improvement and additions but EFDC adopted virtually none of them. It cannot be properly considered a response to “local wishes or needs”.

It is not true to say that insufficient houses could be built without taking Green Belt. The matter was never examined despite pressure from The Epping Society. Higher density redevelopment and the use of brown field sites was never examined by EFDC as part of the LP process.

We do not know if these selected sites “need the least additional infrastructure provision” nor if they are “the most viable and least environmentally damaging”. These matters were not examined and were not a dominant criterion for site selection.. Furthermore, as a matter of law, development is not permitted if it is environmentally damaging.

Epping is described as “a modern town” whereas the character was described as a market town in the Local Plan. It is important to have an agreed character objective for the town as a precondition of any planning policy.

There is so much that is wrong or contentious in the Foreword that it is hard to know where to stop. I have not yet read the narrative between policies because its status is unclear.

It is not clear what congestion has to do with retaining the character of the area.

It is not clear if the NP consists of the whole text, the aspirations or just the policies.

Turning to the policies as stated

Policy 1

Most of this is a repeat of central government policy or the EFDC LP. Accordingly it contains no local content or focus. To state, as it does, that LP policies will achieve particular outcomes is highly contentious because they might not.

The policy stated rehearses one view of the likely future but it does not appear to state any particular local objectives as envisaged for NPs.

Policy 2

This does not seem to be a policy at all but a description of the situation as ETC or the NP committee sees it. The lower level of protection arising from designation as Local Green Space compared with Green Belt should have been stated and further protection could have been given by adopting NP policies for these areas. The list of sites that meet the NPPF definitions are not stated to be so designated so why are they even mentioned.

Table 1

This chart is not much use unless the 2011 housing numbers are given. Why are 5 plan houses not expected to be delivered by 2033 and are there no windfall ones likely to arise.

Policy 3

By stating that the NP “is supportive of the approach in the adopted LP” is to tie the hands of the committee that prepared the document and it is highly contentious. The NP is meant to reflect local needs and aspirations subject only to restrictions imposed by law (it cannot over rule the NPPF or the LP). Why make the NP a hostage to fortune by needlessly tying it to the LP more than national planning policy requires.

It is not clear which Plan is meant in 8th line.

I do not remember anything about improvements to the station approach in the LP and I have not seen any reports that TfL intends to carry out such work. More information on this is required.

The numbers do not add up to 705 as stated earlier.

The sentence “All the sites listed will require infrastructure improvements – junction improvements and ...” suggests that only the sites mentioned need additional infrastructure and that junctions and roads are the only or main issues. Clearly this is not so.

This policy is entitled “Development Proposals” but it mixes up infrastructure (separately covered in section 6) and a re-statement of the LP policies. Has this been thought through. The penultimate paragraph is not only an attempt to repeat the LP but it is confused: it says infrastructure must come first, which EFDC refused to include in the LP, yet it mentions sites where it has not been done.

Policy 4

This is trite because the NPPF requires it.

Policy 5

How can this conclusion be arrived at before the Master Plan has been approved or the planning application approved. The draft I have seen shows it anything but an extension; it is a separate community divided from Epping and Ivy Chimney by a busy road and a ditch / stream with very few access points.

The list of infrastructure stated is not part of the LP so may not happen. The school is, of course, the existing one moved against the stated views of the school and parents. It will lose its place in the hearts and minds of past pupils and residents and the old site will be built on. That means the housing numbers are about 20-25 too low. What evidence did the NP group receive that moving the school would improve education provision in Epping.

I am amazed the NP did not have anything to say about access to this site and to the proposed new school.

Epping South is not “expected to deliver” what is stated. That is the LP policy but as I recall it was “at least”. Why is it “expected” to deliver these when Qualis sites did not.

The NP refers to “the potential for lower density housing” without comment. As we have lost Green Belt to this monstrous idea at least we should expect a high density of housing to minimise future loss of Green Belt. On what basis does the NP claim a low density and why do they think it is a good thing.

The range of “affordable housing” is not subject to the negotiations stated, I believe. The LP specifies the number of units and calls for a range of types. There is nothing I recall to say developers and ECC can have a say. If so why. Isn't this just the sort of issue where the NP could fill in any gaps left by the LP.

Community aspirations page 21

Is this a policy-lite statement? On what basis do the NP committee think these reflect widespread (let alone majority) opinion.

Policy 6

This is not a policy but more a list of aspirations.

We need specific objectives and policies.

As there is no proposal to carry out developments at the station this seems a pipe dream.

The nature of “improvements” needs to be stated. There may be many different views over what is an improvement.

We should consider the removal and perhaps the re-siting of the locally listed station house if it gets us an improvement in station access etc. Where is the evidence the public have a view on the preservation of this building.

Policy 7

It is not clear why the attraction of Epping station to commuters should have any impact on high street parking provision. Why only commuters but not other travellers.

I disapprove of the “dual use” of the Stonnards Hill car park which can only serve to make access more difficult to local people. Was any public demand or support for their change identified and where is the evidence.

The SEMP is already out and it does NOT offer added parking. Surely that is too far from the main attractions in Epping to be any use.

I do not think we should mandate EV charging at all developments. The term “development” includes all extensions and new builds.

Policy 8

Finger posts should be installed now but why are they proposed only for newly designated routes

I believe only the stated policies with directly referenced maps will constitute the NP. The rest is discussion. However, that is not at all clear and it should be.

How can a developer know if it is fair for him to contribute to Greenways.

Aspiration for 20mph. I disagree but if sought there should be a commensurate obligation on ECC to ensure a minimum attainable average speed through the town of (say) 10mph. Evidence should be provided that pollution would be reduced by a lower speed limit and enforcement means should be identified.

Policy 9

Need to specify the range of wider uses in secondary retail frontage.

Reference to 70% seems to be inconsistent with the first two paragraphs.

No need to say the NP is subject to GPDO as the whole policy is as is the LP.

Missed opportunity to put forward a retail shop front design guide. See the one EppSoc put forward for the LP – from Waltham Forest I think. Why has none been included as many other NPs in other parts of the country have done.

Town centre extends too far south (about a block) and I see no reason to add the disconnected areas in St Johns Road. No justification has been given for this.

Policy 10

First para too vague. Exclude residential ground floor and any more first floor or above. I am not a planning expert and so I rely on the NP group to have established the last sentence of the first paragraph actually means something.

Subsequent paragraphs are meaningless without a design guide. This is essential for retail and residential.

Policy 11

This is meaningless without a design guide. By ensuring that the original design is retained would not help improve the character of the street scene where the building had plate glass windows.

Policy 12

Like other policies this is at once ineffectual because it has no specifics or method and it is so vague that unwanted planning applications can cite this and claim they meet it simply by offering jobs and business opportunities. This is a dangerous policy.

Policy 13

The list of places that cannot be redeveloped should include pubs and social clubs which offer recreation and society on a wide scale.

The paragraph is too long and oblique. It should state baldly that such changes will not be supported.

Reference to the library prompts my observation that the replacement should be of no less design merit and convenience. Where is a replacement library going to be and what ugly semi-industrial Qualis style building will be put on the library site.

Library is a decently designed building and should be retained. Any development should encompass the car park to the rear and the church land into a single coherent project in keeping with the listed church and listed cottages opposite.

Table 2

Well so much for the EFDC claim that we have an aging population. Clearly Epping differs very little from Essex as a whole and not materially from the rest of the UK.

Policy 15

Bungalows are not the only type of property suitable for older people. The policy should be more positive and call for a proportion of suitable buildings in new developments to balance out the entire stock in the town. Flats can be suitable for older people if enough storage and access and outdoor space.

I do not understand the objection to basements. The grounds stated are structural issues not relevant to planning. Of more relevance to planning is any change that increases occupancy and/or vehicular movements and the effect on the neighbours and community. As stated this is a justification for a poorly drafted LP policy and accordingly irrelevant.

The last para is redundant because changing the character is already covered in LP but ignored by Qualis.

Policy 16

No planning policy has the capacity to ensure the supply of any particular service. It could say that development of any multi-line retail convenience premises will be resisted if there is no replacement as with pubs and policy 13.

Policy 17

Too weak. Mostly in line with the weak version in LP

ETC should commit to adding listed premises and artefacts.

Policy 18

This apes national policy so meaningless while “expected” is far too weak.

“Reducing carbon emissions” means CO2. The policy needs to address total emissions so destruction of an existing building should be taken into account.

“Maximising energy efficiency” is tosh. Does the NP call for 200mm wall insulation, 400mm, 600mm?

This is virtue signalling.

SUDS is already required on all development proposals so saying above 10 properties does not meet NPPF

Why have we to minimise water usage. There is plenty of it in the UK

Generally, please see a list of policies attached, some of which overlap with the above.

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Epping Neighbourhood Plan

Proposals for additional policies

Policies should include as many of the following as possible. These were all put before EFDC during the Local Plan process but not taken up. I consider they would enhance the town.

- 1 Air Quality within the town boundaries to be monitored and remedial action taken if the situation is poor or deteriorates including a freeze on development.
- 2 Traffic levels ditto. Note EFDC proposals for certain junctions in the town but adopt a policy of using Epping Forest land as a last resort.
- 3 Any works at junctions should not take Green Belt or forest land when other land is potentially available (eg at Bell Common and Wake Arms).
- 4 SUDS requirements should be enforced and made applicable to alterations of existing drives and paved areas. I note that Revival Court has no SUDS.
- 5 Development should be built as approved and arrangements should be made by the LPA and ETC to enquire into any case referred to it which appears to be inconsistent with consent given.
- 6 Retrospective development applications to be subject to additional fees the funds from which will go towards the costs of point 5.
- 7 Quality panel for Epping to include [50] per cent local residents and the Chair not employed in the previous [10] years by planning or development businesses or local authorities, agendas and minutes to be published, right of initiating their own enquiries (for example on prominent or repetitive issues of concern).
- 8 Green Belt Boundaries and EFDC approved development sites to be clearly recorded by ETC on large scale plans available for viewing at their premises and online.
- 9 No development contrary to Green Belt regulations.
- 10 EFDC local plan housing numbers and trajectory to be monitored and up to date each quarter end within [30] days to show plan, starts, finished. Also housing mix within that.
- 11 Masterplans shall be published in draft, consulted upon (and responses shall be published) and approved before any planning application is validated for the site. Any site for 10

houses (or X m2 of commercial space) shall be subject to this masterplan procedure. The practice of publishing Masterplans and planning applications for large sites all within a few days and comprising thousands of pages does not facilitate a proper public consultation.

- 12 At the beginning of any local plan review a full, up to date report on housing numbers, population and infrastructure will be published.
- 13 Housing and development density generally within ETC shall be a material consideration in any planning application for more than [6] houses or [??] m2 of non-housing development. Data on development density in the main communities and large estates will be computed and kept up to date.
- 14 Retention of employment sites within reasonable and practical walking distance of housing should be NP policy.
- 15 No development unless there are safe pavements (1.5m wide) and safe cycling routes to the High Street and local leisure facilities including Epping Forest and green spaces.
- 16 Design guides to be adopted for housing and high street. Use National Design Guide (January 2021) as basis and respecting the Heritage Alliance observation that “The core of any place value is in the appreciation of the communities living there, in their perception of what constitutes the place’s uniqueness, character, heritage and meaningfulness.”
- 17 Traffic volumes through Epping must be monitored and developments should not proceed if delays and pollution are outside acceptable parameters. Consider also monitoring modal shift for the same reason.
- 18 ETC to develop a brown field site register in the apparent absence of this by EFDC.
- 19 Always oppose development inside Green Belt unless fully justified in accordance with the MGB regs.
- 20 Condition developments so annexes, garages, outbuildings do not become separate dwellings.
- 21 IDP progress before development ED5-EFDC MIQ Matter 14.
- 22 Capacity and reliability of TfL to be a material consideration in new planning applications for more than [6] dwellings.

- 23 Policy to improve access to Epping Station for buses and pedestrians prior to any development on that site.
- 24 Specify density of development especially on former MGB.
- 25 Ensure high standards of place shaping through masterplan process. Ensure the public are fully informed and have an opportunity to give their views on any Masterplan, and those views to be respected in any planning proposal.
- 26 Seek out and put forward additional buildings and structures for listing and protection.
- 27 All policies should support the reinstatement of the character of the town as a market town.
- 28 The establishment of an “art” cinema in the town should be a cultural objective.
- 29 Schools should be expanded where necessary and not replaced. Schools and other key infrastructure used by the public should not be located at the extreme edges of the town any more.
- 30 A library should be retained within the central area of the town.
- 31 A proportion of houses on sites > (say) 20 to be reserved for small and micro builders, also self-build. This was recommended by a HoL committee to counter the loss of SME builders during recent economic downturns.
- 32 Public bodies to encourage small builders and smaller and newer architects through competitions (charettes) for public projects under (say) £? Value.