

**Table 2: Epping Forest District Council’s complete response to the Epping Town Neighbourhood Plan 2024-2033 Submission Version August 2024 Regulation 16 consultation**

No.	Page, policy, paragraph no.	Comments	Recommended action
1	<b>Cover</b>	The period the Neighbourhood Plan (NP) covers is not included in the title of the Plan but at the end of P3.	Include in the NP title - 2024-2033
2	<b>Foreword:</b> P2 3 <sup>rd</sup> Para & P9 Para 2.12	The NP states that it ‘sets out proposals for new homes.’ Sites have been allocated by the Local Plan not the Neighbourhood Plan.	To be accurate and avoid confusion it would be better if the NP policy and supporting text stated that the NP supports the Local Plan spatial strategy. There is actually no need to allocate the sites again in the NP if they are allocated in the Local Plan.
3	P3 4 <sup>th</sup> bullet	What is meant by ‘Young’ homes?	Should be clarified.
4	<b>1.Introduction</b> P5 Para 1.8 5 <sup>th</sup> bullet	Travel to work figures may be out of date and has no source references. Are travel to work patterns from 2011 the most up to date statistics available for Epping?	The source document reference should be provided (and for all sources referenced in the NP) and if more up to date figures exist for travel to work in Epping they should be used.
5	<b>2. Epping: The Big Picture</b> P8 Para 2.2	The NP states ‘follows the allocations for new housing in the Epping Forest District Plan, in order to meet the requirements of land supply set out in the NPPF, with consequent alterations to the Green Belt boundary.’	For clarity suggest an alternative: <i>‘the NP supports the implementation of the Local Plan allocations and consequent alterations to the Green Belt boundary. The Epping Neighbourhood Plan does not propose any additional residential sites for development or any further alterations to the Green Belt boundary.’</i>
6	P9 Paras 2.7, 2.8 and 2.9	Whilst the provision of approximately 700 new homes for Epping reflects Policy SP1 C in the EFD Local Plan these three paragraphs need some updating in light of adoption of the Local Plan.	Use information from Chapter 5 ‘Places’ P119-124 of the adopted plan on Epping including the Vision for Epping and employment site information. In para 2.9 consider expanding the comment on infrastructure to include that the Infrastructure Delivery Plan is a live Plan which will be developed and progressed between all interested stakeholders inc. the District Council, Epping Town Council, and developers.

7	P10 Para 2.10	The title of Policy SP5 in the EFD Local Plan is incorrectly referenced as 'Green Belt and District Open Land'	Amend to correct title of Policy SP5 in the Local Plan 'Green Belt and Local Greenspace'.
8	<b>3. Vision</b> P12 Para 3.5	Consider clarifying the origin and role of Community Aspirations.	Community Aspirations could be highlighted as issues that have arisen as part of the consultation on the NP and do not form part of the development plan policies.
9	<b>4. The Forest, Green Belt &amp; Natural Environment</b> P13 Para 4.1	Some grammar is used inconsistency – e.g., use of capitals - ' <i>The Forest</i> ' firstly used in this sentence followed by ' <i>the Forest</i> ' later.	Review and amend as appropriate for consistency and clarity
10	P12 Para 4.1	Policy 1 of the NP makes it very clear that the NP is not encouraging more people to visit Epping Forest. However, this paragraph could be taken as suggesting the NP is, which would be contrary to the aims of Local Plan which seeks to reduce recreational pressure on the Forest	Amend the wording in the paragraph to reflect the intentions more accurately re Epping Forest expressed in NP Policy 1.
11	P13 Para 4.2	This paragraph implies that all the points made in the bullets are related to the NPPF and the protection of the Green Belt which they are not.	Redraft the paragraph to reflect the stated purposes of the Green Belt in the NPPF or specifically draft to demonstrate the particular impacts the role of the Green Belt has had on the spatial strategy. Clarify the purpose of the second bullet emphasising that it is easier to build new settlements? The third bullet point is not relevant to Green Belt.
12	Policy P 1 2 <sup>nd</sup> Para	The Green Infrastructure Strategy was adopted in April 2021 therefore it is no longer a draft.	Remove ' <i>draft</i> '
13	<b>5. Epping's Growth &amp; Development</b> P16 Para 5.1	Some of the text in this paragraph does not wholly reflect the text of Policy P1 in the Local Plan	EFDC would recommend reviewing Policy P1 and amending some of the text in this paragraph.

		Use of words ' <i>local centre</i> ' and ' <i>roads</i> ' in this paragraph are not considered appropriate.	<p>Re use of '<i>centre</i>': See point 19A below.</p> <p>Re use of '<i>roads</i>': The term roads is sending the wrong message as it implies car dominated patterns of development which EFDC will be seeking to address through the masterplan. It is more accurate to refer to streets not roads. The Active Travel requirements and thrust of new master planning which should be envisaged for the site will have a focus on Active Travel routes and greenways/ car free streets etc. This cannot be described as roads, but streets does cover this.</p> <p>Please also note this comment in regard to the use of '<i>roads</i>' / '<i>road</i>' in paragraph 5.9 and Policy 5.</p>
<b>14</b>	P16 Table 1	There is no reference to the source of the population figures come.	Include a source reference for the population figures either in the paragraph or a footnote.
<b>15</b>	P17 Policy 3	<p>Are the site allocations meant to be a complete list? If so they are not complete</p> <p>EPP.R3 residential allocation has been removed from the adopted Local Plan.</p> <p>Note on infrastructure.</p>	<p>Refer to information from Chapter 5 'Places' P119-124 on Epping in the Local Plan for the list of allocated residential sites.</p> <p>EFDC recommend removing this site reference as it is not about residential development and Policy 6 deals with the transport in the NP. Also note the comment made by EFDC in 2018 and 2020 re concerns regarding the deliverability of the requirement for 'an improved station' now written as 'station improvements'.</p> <p>Where specific infrastructure is required the evidence for this should be included.</p>
<b>16</b>	P18 Policy 4	It is questionable as to whether this policy is adding anything additional to what the NPPF states. Policy should add value to policy contained in other local	Consideration should be given to removing this policy as it is not adding too but simply restating policy contained in the NPPF.

		or national documents as opposed to restating it.	
<b>17</b>	P18 Paragraph 5.9	<p><i>‘In contrast with the consents for flats and apartments in the town centre....’</i></p> <p><i>‘..., plus an alternative route to connect traffic with Theydon Road (south)....’</i></p> <p><i>‘...a circular walking route...’</i></p> <p><i>‘...the protected areas proposed on Map 1...’</i></p>	<p>EFDC would recommend amending as although it is correct that the site will provide for a lower density than the town centre South Epping will also need to provide a balance of small and large homes along with a percentage of accessible homes to provide for a diverse community. It is inevitable that the provision of smaller homes will require some apartment blocks.</p> <p>EFDC would recommend amending as the text reads like there will be the construction of an alternative new road which is not proposed. The IDP sets out the highways upgrades.</p> <p>EFDC would recommend amending as it would be more accurate to refer to this as an active travel route or quiet way to accord with the IDP.</p> <p>EFDC would recommend amending as Map 1 illustrates <i>‘proposed greenway’</i> links but does not refer to <i>‘protected areas’</i> – what does this refer to? It would be clearer to use the same language in the text as illustrated on the map.</p>
<b>17A</b>	P17 Paragraph 5.9, 5.10 and Policy 5	Facilities that will be provided are still being explored esp. in the light of the proposed reduced allocation of homes in South Epping Masterplan Area (SEMPA).	<p>Review these paragraphs and Policy 5 in the light of the comment below: The Local Plan in P1 states that <i>‘appropriate community and health facilities, employment and retail uses’</i> will be provided in SEMPA, and it would be more accurate at this stage to use that terminology to replace both references to specifics such as <i>‘opticians’</i>, <i>‘pharmacy’</i>, <i>‘chiropody’</i> etc. and broader terms such as <i>‘health hub’</i> and <i>‘local centre’</i>. Note also that the Local Plan refers to a new leisure centre in Epping but not in SEMPA.</p>
<b>17B</b>	P17 Policy 5 & Paragraph 5.10	Priority should be given to referencing ‘Active Travel Infrastructure’ over ‘additional parking.’	Active Travel infrastructure upgrades should be referenced somewhere in Policy P5 as this is a key component of the Local Plan and should be reflected in the master planning. The site should aspire to encourage modal shift away from private vehicles to encourage healthy active lifestyles and reflect the 40% drop in young people availing of driving

		<p>Policy 5 <i>‘...with advance connecting road infrastructure...’</i></p> <p>5.10: <i>‘...additional public parking...’</i></p>	<p>licences over the past two decades. Once built out, the site will be inhabited by a demographic that prioritises private car use far less than the current dominant demographic.</p> <p>‘Active Travel infrastructure’ is relevant both within the site and in connecting the site to Epping and should be given a priority in Policy 5 and its supporting text over solely referring to vehicle parking and roads.</p> <p>If there is a desire to refer to additional public parking too please expand on the reasoning so that it does not seem to conflict with the Local Plan’s approaches to promoting sustainable transport and reducing recreational impacts on the Forest. For example, is the additional parking proposed to provide access to the green spaces/SANG?</p>
18	Policy 6	<p>This policy is not generally incompatible with the EFDC Local Plan although the Local Plan does not reference improvements to Epping Station and both in 2018 and 2020 EFDC raised <i>‘concerns regarding the deliverability of the requirement for ‘an improved station’</i> now written as <i>‘station improvements’</i>. However, the reference to providing more car parking in paragraph 1 of the policy does not align with the policy direction in the Local Plan.</p>	<p>Remove the reference in paragraph 1 of Policy 6 to increasing car parking at Epping station.</p>
19	Policy 7	<p>This policy is not incompatible with the EFDC Local Plan with its initial emphasis on supporting walking, cycling and public transport which is reflective of Policy P1 D Sustainable Transport Choices in that Plan. However, the emphasis</p>	<p>Remove or dilute references to increasing car parking in this policy.</p>

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		on increasing car parking in this Policy does not align with direction of Local Plan policies.	
<b>20</b>	P23 - Map 1	Map 1 is not as accurate and clear as it should be  Legend: Employment 'allocations'	Allocated and designated sites should reflect the map used in adopted Local Plan on P125.  Amend to Employment Designations (not Allocations) as that is how these sites are defined in the Local Plan
<b>21</b>	P31 Policy 10 last Para	Linking change of use of first floor retail space to residential to appropriate parking is ambiguous and could be taken to mean parking is required which would conflict with Local Plan policy which is to promote reduced/car free development in town centres.	The last paragraph needs to be clarified to ensure that it does not conflict with Local Plan policy on parking.
<b>22</b>	P35 Table 2  Para 10.1	Uses 2011 census data  Table 2 does not show that there are a greater proportion of older people in the area compared to the county averages.	Consider updating to most recent published census 2021 data.  Amend the sentence to reflect the information more accurately in Table 2
<b>23</b>	Policy 17 <b>Protecting the Parish's Heritage Assets</b>	EFDC commented in 2018 and 2020 that consideration should be given to placing the review of the town's conservation areas in the supporting text as it is not strictly a land use policy.	EFDC recommend placing the reference to a review of the town's conservation areas in the supporting text
<b>24</b>	P40 Para 11.9	Policy HC12 is from the now out of date Local Plan which has been revoked following the adoption of the new Local Plan.	Replace reference to policy HC12 with policy DM7 Historic Environment of the newly adopted Plan (page 94).

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25	13. <b>Making it Happen</b> P43 Action Plan Action 1	Green Belt boundaries have already been agreed through the adoption of the Local Plan	Amend accordingly
26	P49 Annex B	The table is not just about masterplans.  If this is meant to be a complete list of proposed residential development for Epping Town in the Local Plan it is not complete	Amend title to reflect that the table is not just concerned with Masterplans but with residential development in Epping.  Use information from Policy P1 Part B (page 122) on residential development for Epping - total minimum of 709 residential units.
27	P58 Annex J Glossary of Terms	Some glossary amendments needed	Amend: EFTC – amend to EFDC.  Developer contribution / s.106 – amend to S106.  LPSV – delete if there are no longer any references to the LPSV as the Local Plan has now been adopted.  S.106 - amend to remove dot between S and 106 - should be S106  SLAA - amend 'Available' to 'Availability'

**FINISH**