

Annex L

Consultation Responses : September 2018: Epping Neighbourhood Plan (Regulation 14) July 2018 consultation

Vision

- There was little comment on the Vision and Aims, except that the Epping Neighbourhood Plan cannot satisfy the 'Conformity' requirement in the Basic Conditions until the Epping Forest Local Plan has been Examined and approved,

Growth & Development

- raise doubts that the South Epping development will be able to satisfy the stringent environmental safeguards, particularly in light of recent case judgements and findings,
- raise doubts that the South Epping site is capable of supplying either the total number of homes projected in both the ETNP and EFDC SVLP, (pointing out the discrepancy between the two documents) or the numbers to satisfy the supply required over the next few years required by NPPF,
- that the policies in ETNP restricting the levels of future development don not accord with the 'presumption in favour of development' within NPPF,
- Alternative sites put forward with arguments that they are less damaging to the Green Belt and don't have the environmental drawbacks attached to South Epping are:
 - Stonards Hill recreation ground 130 dwellings
 - East Epping – at least 500-600 new homes plus community facilities and green space
 - Epping Sports Club (with a new sports club to be developed off Bury Lane)
 - Coopersale Cricket ground – 28 dwellings
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Protecting the Green Belt & Open Spaces

- raise objections to the green corridors and green spaces proposals in the Plan, in relation to alternative development proposals (below)
- Epping Society challenges the housing totals allocated to Epping arguing that the proposals are so damaging to the green belt and the character of Epping that they should be revised downwards, and favours higher density development of 'brownfield' sites.

Several respondents have raised similar issues and concerns:

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- the highways congestion problems in existing parts of Epping adjoining the South Epping will be greatly exacerbated and that new highways infrastructure will not be created to alleviate the problems,
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Some respondents refer to the complexities attached to the 'brownfield' sites within the ETNP – Epping Station, St. John's Road, St Margaret's Hospital, leisure centre, Cottis Lane & Bakers Lane car parks sites and that they will not accordingly be capable of delivering new homes over the next few years as required by NPPF.

One respondent argues that the SHMA upon which the EFDC SVLP housing figures are based is flawed and that a higher target will be required.

On the basis of current modelling data TfL does not believe Central Line capacity should act as a deterrent to planned growth in the Draft Local Plan.

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Several responses raise issues which would alter the Plan's proposals:

- TfL CD – the development at Epping Station would involve more dwellings but with a low / nil parking provision due to the proximity to transport infrastructure
- West Essex CCG is not proposing new GP surgeries at St Margaret's or St Johns sites and is working with NHS England to review future health services delivery arrangements and associated infrastructure

- Essex CC Highways does not support many of the proposed highways measures. The transport interventions being pursued is to address network issues from north of Epping through to the M25 to mitigate planned growth rather than to deal with congestion already experienced – which would take land from Epping Forest Special Area of Conservation.
- ECC Highways does not oppose on balance an extra lane at Bell Common traffic lights, no bypass option is available through currently proposed growth plans for Epping, ‘Infrastructure to support South Epping’ and measures regarding Brook Road / Bridge Hill) need to be clearer, provision of ‘improved traveller information tools’ might be useful in the local context, car-parking charges are a demand management tool but the 600+ additional public car parking spaces in Epping will draw in more car traffic, exacerbating the congestion problems, policies and proposals should focus on reducing the need to travel, and prioritising sustainable travel.
- The developers of South Epping have suggested that in addition to access roads a non-vehicular connection across the site and across the railway would encourage more sustainable transport patterns,
- ECC is considering potential for a Park and Ride facility at North Weald to serve Epping station,
- TfL Suggests extending some of the Mayor of London’s Transport Strategy policy objectives to Epping – promotion of Healthy Streets, rebalancing the transport system towards walking, cycling and public transport, improving air quality and reducing road danger,
- Development of Steam Laundry and EFDC offices for non-employment uses conflicts with promotion of employment.

Response Tables

Table 1: Total Number of Responses

Numbers of Responses	Forms	On-line	Letters	Overall Total & % of households

Table 2: % Agree / Disagree

Draft Policies	Agree No. / % of response	Disagree No. / % of response	Topic & No. of added comments

The Vision			
Growth & Development			
Protecting the Green Belt & Open Spaces			
Facilities			
Transport & Parking			
Town Centre			
Tourism			
Employment			
Residential Amenity			
Heritage			
Sustainability			

Table 3: Key Responses (in summary) with Recommendations

Proposed Policy & Text Changes To Be Considered

Comment / Objection / Changes Put Forward	Source of Comment Reference Number (from Table 4)	Recommendation (Alterations to text / maps highlighted in yellow)
Vision & Aims		
consider all policy proposals against the list of “What residents like” and “Big issues to address” (page 6)	4.Epping Society	Review issues, aims, and objectives to ensure they are compatible No changes to text
<p>Draft Neighbourhood Plan lacks the required associated documents – Basic Conditions, Habitat Regulations, Environmental Assessment and Consultation Summary,</p> <p>As such the Neighbourhood Plan fails to meet required guidelines</p>	6.-9, 36 Vincent + Gorbong on behalf of Wates Developments Limited (“Wates”)	To note, and ETNP will be submitted after Local Plan has been examined and approved

<p>ETNP cannot be progressed until Local Plan is submitted and examined.</p> <p>Key strategic issues remain open to scrutiny – the overall District housing requirement, the allocation to Epping and of release the Green Belt.</p> <p>ETNP should at least be held in abeyance whilst strategic issues are resolved;</p>		<p>Basic Conditions, ESA etc will be prepared with Submission Version</p>
<p>Some ETNP proposals are shown beyond the parish boundaries and should be deleted</p>	<p>55.Iceni on behalf of Tele Lands Improvements Ltd</p>	<p>Review maps to ensure proposals are contained within Epping parish</p> <p>Change Map 1 – add parish boundary</p>
<p>Policy 1: Protection of the Forest and the Green Belt</p>		
<p>Environmental Impact</p> <p>The NP area boundary lies within the impact risk zone and includes part of Epping Forest SAC and Site of Special Scientific Interest.</p>	<p>50.Essex County Council</p>	<p>The Neighbourhood Plan will have regard to the assessments and mitigation measures achieved through the EFDC SVLP.</p> <p>No change to text</p>
<p>It is recommended that the Plan makers undertake a SEA Environmental Report prior to the examination of the NP, exploring whether the NP would have any significant effects</p>	<p>51.Essex County Council</p>	

<p>on the environment. This should cover the assessment of the NP's policies and the NP's site allocations, including all reasonable alternatives.</p>		<p>The submission version of the Neighbourhood Plan will be accompanied by the appropriate SEA, HRA, Basic Conditions, etc. having regard to the allocations made in the District Plan.</p>
<p>Green Belt boundary changes</p> <p>ECC notes that Policy 1 describes the extent of Epping Forest and the Green Belt plus changes to the green belt – and these should be shown on the associated maps which a revised version of this NP needs to address</p>	<p>49. Essex County Council</p>	<p>No change to policy 1 but alter relevant maps</p> <p>Alter Map 1 to show extent of Epping Forest and Green Belt</p>
<p>ETNP describes changes to the Green Belt boundary by virtue of the allocation of the land at South Epping for housing development and its removal from the Green Belt. In contrast, Wates land at Stonards Hill remains within the Green Belt and is designated as Local Open Space</p> <p>In terms of the impact on the Green Belt the evidence base shows clearly that development of the land at Stonards Hill would have less impact on the Green Belt than the South Epping area.</p>	<p>59. Vincent + Gorbing on behalf of Wates Developments Limited ("Wates").</p>	<p>Review green belt / local open space designations to avoid conflict or confusion</p> <p>Include site assessments as an annex in the Plan</p>
<p>Policy 2 Protect and Enhance Open Space</p>		

<p>concerned there could be conflict between the Green Belt designation with others proposed as Local Green Space.</p> <p>Proposals to build on the Green Belt, whose openness was meant to be assured for all time, shows that public authorities cannot be trusted to comply with agreed designation even within a single generation.</p> <p>Propose that the town green and Stonards Hill recreation ground should be designated a Local Green Space</p> <p>not convinced by the draft NP that the wildlife corridors will achieve their apparent purpose.</p>	<p>54.Epping Society</p>	<p>Review designations to avoid conflict or confusion</p> <p>The comments concerning the extent of housing requirement in the parish are addressed below.</p> <p>Review designations for Local Green Spaces</p> <p>Delete designations for 'wildlife corridors' in para 4.3 and Policy 2</p>
<p>Some ETNP proposals are shown beyond the parish boundaries and should be deleted. This would mean that the remaining Wildlife Corridor running between Bury Lane and Lindsey Street does not provide a connection between strategic or designated wildlife sites and therefore does not function as a wildlife corridor.</p>	<p>56-58.Iceni on behalf of Tele Lands Improvements Ltd</p>	<p>Delete designations for 'wildlife corridors' (as above)</p>

<p>Wates object strongly to the designation of the land at Stonards Hill in Policy 2 and on Map 1 as Local Green Space. It would appear that this proposal is at least in part seen as strategic mitigation for the impact of development at Epping South on the integrity of the Epping Forest SAC.</p> <p>In contrast, as part of a comprehensive scheme with approximately 130 units on 10 acres of land, Wates are proposing to use the majority of the site to create a substantial new Country Park of over 20 acres, coinciding with the higher areas of land to the east. The existing trees, hedgerows and woodland areas in this part of the site would be kept and enhanced with new planting, and the grassland areas improved to create species-rich wildflower meadows,</p>	<p>60.Vincent + Gorbong on behalf of Wates Developments Limited (“Wates”).</p>	<p>Review open space designations in Policy 2</p> <p>Add reasons for designation to Policy 2</p>
<p>Local Designated Green Space, which includes the land at Coopersale Cricket Club;</p> <p>disagree with the proposed wildlife green corridor on the eastern side of Epping and it is considered that Policy 2 in Draft ETNP does not comply with basic conditions</p>	<p>61.Carter Jonas LLP on behalf of Chisenhale-Marsh Estates Company</p>	<p>Review evidence for designation</p> <p>Add reasons for designation to Policy 2</p>

<p>Local Green Space designation is deleted from the Coopersale Cricket Club site should be deleted – lack of evidence</p>		
<p><i>“no reduction in the extend and quality of the open space... at the Epping Cricket Ground”</i> requires a much higher threshold than applied by either the NPPF or SVLP.</p> <p>No justification or evidence in the ETNP for this contrary to NPPG</p> <p>Policy 2 should be reworded to reflect the NPPF and SVLP requirements.</p>	<p>25. Icen on behalf of Tele Lands Improvements Ltd</p>	<p>Change wording of Policy 2 to deliver protection of open space and compliance with NPPF</p>
<p>Reject allocation of land as Local Open Space at</p> <ul style="list-style-type: none"> - Stonards Hill - unsound and undeliverable; 	<p>6.Vincent + Gorbing on behalf of Wates Developments Limited (“Wates”)</p>	<p>Review evidence for designation</p> <p>Add reasons for designation to Policy 2</p>
<p><u>Paragraph 5.12 (Page 16)</u></p>	<p>62.Essex CC</p>	

This refers to the need to for development to require the inclusion of protection for important trees, hedges, open spaces but this is not specifically referred to in the policy wording.

Section 11 'Enhancing the Parish's Heritage and Public Realm'

The need to protect and enhance local landscape features could be reflected in the wording for the community aspiration set out on page 38,

ECC advises that the Conservation Areas of Epping Town will afford some protection to trees but it would also be beneficial to refer to the need to encourage the retention and replanting of trees, and other landscape features within the Conservation Area and wider town area.

It is suggested that references and guidance for the protection and enhancement of landscape features, trees, hedges, and planting could also be reflected within the policy wording for these policies.

Policy 9 This policy would benefit from a specific title so that it accords better with the remaining document.

Include wording from 5.12 in policy 3

Add references and guidance for the protection and enhancement of landscape features, trees, hedges, and planting in policy 18

		Add title to policy
Growth & Development: Policy 3 Development Proposals		
<p>it is not clear to ECC how the stated 1,250 home figure has been arrived at and justified</p> <p>should match 1,305</p> <p>Revise table 1 to illustrate the trajectory of growth</p> <p>Sites should have densities and numbers</p> <p>The Neighbourhood Plan contains some inconsistent references to the capacity of the South Epping Masterplan Area, particularly between Policy 5 and Annex B. We would suggest that the Neighbourhood Plan should be consistent with the draft Local Plan.</p>	<p>11, 16-18, 21 Essex County Council</p> <p>23.Epping Society</p> <p>24.David Lock Associates (on behalf of SEMPA)</p>	<p>Details of dwelling numbers for each site to be made clearer between policy text and Plan annex – and that housing total matches EFDC SVLP and achieves conformity</p> <p>Revise table 1 to illustrate the trajectory of growth</p>
<p>Additional / alternative sites should be considered / included as being less damaging to the green belt, South Epping may not deliver required numbers, the sites are more likely to be delivered within an acceptable timeframe,</p>	<p>6, 34, and 35, 37 .Vincent + Gorbing on behalf of Wates</p>	<p>Not to include the four sites put forward in the Neighbourhood Plan.</p>

<p>and with the Sports Club(s) will enable up-to-date sporting facilities to be provided:</p> <ul style="list-style-type: none"> • Stonards Hill recreation ground 130 dwellings • East Epping – at least 500-600 new homes plus community facilities and green space • Epping Sports Club (with a new sports club to be developed off Bury Lane) • Coopersale Cricket ground – 28 dwellings – a new cricket pitch would be provided (not specified) 	<p>Developments Limited (“Wates”)</p> <p>28.Carter Jonas LLP on behalf of Chisenhale-Marsh Estate Company</p> <p>29 - 31.Epping Bowls Club</p> <p>32.Epping Cricket Club</p> <p>33.Epping Tennis Club</p> <p>38. Pigeon (representing the East Epping proposal)</p>	<p>To note that these sites could be available in future in para 5.14</p> <p>include site assessment tables as annex in revision to Neighbourhood Plan</p> <p>There is no evidence to date to suggest South Epping will not provide planned housing numbers within an acceptable timeframe.</p> <p>No basis at present to allocate suggested sites for housing and related development</p> <p>The disparity in size means that Stonards Hill site is not an alternative to South Epping.</p> <p>Therefore it should be considered as an additional site, but no case for additional sites at present. EFDC SVLP has sufficient sites to meet SHMA. No evidence that any additional housing needs should be met in Epping.</p> <p>Challenges to SHMA should be addressed through EFDC SVLP. No evidence at present to suggest housing land supply position at District level will be</p>
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		below or drop below a five year supply necessitating extra development in Epping parish.
<p>Epping is at the top of the settlement hierarchy and is defined as a town centre,</p> <p>local housing needs will not be met if the lower housing need figure from the SHMA 2015, should use the 2017 figure 12,573 , so the draft ETNP does not comply with Basic Condition</p> <p>Epping Forest District Council will need to update the housing target / additional land should be directed to land within and on the edge of Epping to meet the higher housing target derived from the SHMA</p>	<p>27.Carter Jonas LLP on behalf of Chisenhale-Marsh Estate Company</p> <p>Owns Coopersale Cricket Club</p>	<p>Challenges to SHMA should be addressed through EFDC SVLP. No evidence at present to suggest housing land supply position at District level will be below or drop below a five-year supply necessitating extra development in Epping parish.</p>
<p>the additional homes proposed for Epping is disproportionate</p> <p>support plans to maintain the market town character, with a wider and more ambitious plan to arrest or reverse the change in character of the town too much of a commuter town, which will be much more pronounced after the addition of a large number of new homes and households (which are bound to be newcomers to our community).</p>	<p>14.Epping Society</p>	<p>The comments challenge direction for future growth set in EFDC SVLP and to reverse 'commuter' pattern</p> <p>The Neighbourhood Plan is unable to address these issues.</p>

<p>the allocation made to Epping in the EFDC LPSV is not proportionate to the size of Epping, and pressure from elsewhere does not amount to the special circumstances demanded by the NPPF.</p>	<p>23.Epping Society</p>	<p>Challenge to SHMA should be addressed to EFDC SVLP</p> <p>No change to policy.</p>
<p><i>Policy 3 there is a strong presumption against further residential development of sites for more than 5 dwellings". This is a significant contradiction to and departure from the requirements of the NPPF and SVLP</i></p> <p>Policy 4 should be reworded as follows:</p> <p><i>"The Parish Council will take a positive approach to the consideration of development proposals, reflecting the presumption in favour of sustainable development contained in the National Planning Policy Framework."</i></p>	<p>26.Iceni on behalf of Tele Lands Improvements Ltd</p>	<p>Review wording of Policy 3 to deliver protection of open space and compliance with NPPF</p> <p>No evidence at present to suggest housing land supply position at District level will be below or drop below a five-year supply necessitating extra development in Epping parish.</p>
<p><u>Policy 4</u></p> <p>By restricting the policy against further residential development of sites for more than 5 dwellings, (lacking any justification for this figure) there is a risk that small-scale</p>	<p>19.Essex County Council</p>	<p>Review this aspect of policy 4</p>

<p>growth with an impact on infrastructure would be unable to deliver developer contributions.</p>		
<p>Policy 5: South Epping - , it is suggested that the Town Council works with EFDC on facilitating S106 agreements which allow for review points to capture this value uplift. Although EFDC will be responsible for dealing with planning applications and a party to S106 agreements (instead of the Town Council as a rule), consideration could be given to the use of such a value uplift capture mechanism for other developments identified through the NP</p>	<p>20.Essex County Council</p>	<p>Review policy to seek appropriate s .106 provisions</p>
<p>South Epping: nearby residents are vigorously opposed, and we share concerns that Brook Road might be overcrowded by traffic as a result of development and flooding might increase. We do not support development of the green belt.</p>	<p>23.Epping Society</p>	<p>No change to policy</p> <p>There are no practical alternatives to development in the green belt to achieve the numbers required. The proposal for South Epping contains road infrastructure measures.</p>
<p>Policy 5: Should be re-written, to state clearly that no development should proceed until funded, timetabled infrastructure capacity has been agreed. Numbers : “in excess of 800 homes” and “875+” should be reconciled.</p>	<p>23.Epping Society</p>	<p>Alter wording of policy 5 so housing numbers match EFDC Local Plan</p>
<p>Policy 6: <u>Epping Station development</u> the proposed capacity of 89 homes is conservative and should be revised upwards, and at the very least represents the absolute minimum amount of homes that the site should be expected to bring forward.</p>		<p>Alter wording of policy 6 and Annex B to show 89 proposed residential development within Epping Station scheme as a minimum</p>

<p>Improvements to access and surrounding connectivity will be provided as part of any development at Epping Station.</p> <p>Any development of Epping station would retain a proportion of the current car parking spaces for commuter use. It is expected that any new residential development at Epping Underground Station and car park would have limited car parking available for future residents the neighbourhood plan should commit to explore car free residential development at Epping Underground Station, provided that it is demonstrated that there would be no harmful impact on street parking or other services that could not be mitigated.</p> <p>ECC would not support extra parking at Epping Station which would encourage commuting and would not encourage sustainable travel to the station, and is not in line with EFDC LPSV</p> <p>ECC is considering potential for a Park and Ride facility at North Weald to serve Epping station.</p> <p>EOR is committed to developing and maintaining a rail-to-rail link with the Underground at Epping, development should include an interchange</p>	<p>41. Transport for London Commercial Developments</p>	<p>Review wording in policy 3 and Section 6 re. car-free developments in town centre</p> <p>Include wording in section 6 re possibility of park & ride proposals.</p>
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	<p>42. Essex CC</p> <p>44.Epping Ongar Railway</p>	<p>Include interchange in policy 6 re Epping Station redevelopment</p>
<p>Low density areas should have greater density to reduce the impact of the target housing numbers on the Green Belt.</p> <p>We do not accept that there is a proven housing “need” anywhere near current plans and are not persuaded that a significant number of additional homes is needed to accommodate our own population,</p>	23.Epping Society	<p>No change to policy</p> <p>Not clear which areas are proposed for demolition and redevelopment</p>
<p>Housing mix</p> <p>We approve of the thought but feel the policy needs greater clarity.</p>	23.Epping Society	No change to text

There should be a robust policy concerning a new sports centre before development of the current town centre site.	23.Epping Society	Agree: alter wording of policy 3 and 14
Conversion of the Epping Steam Laundry site for housing appears to be in conflict with other policies which promote employment for offices, studios, workshops and other commercial premises.	23.Epping Society	Steam Laundry site not appropriate to meet modern employment needs.
Disagree with the proposal for a hotel on the EFDC office site in the High Street and recommend instead a hotel on the St Johns Road site	23.Epping Society	Agree: remove hotel proposal from EFDC office site policy 3 and add possibility in St John's site
a visitor centre should be alongside future ETC offices	23.Epping Society	Agree: change policy 10
A proposal for 50 housing units at the Bell Motel is very confusing, should only replace the modern blocks with more than 50 units with landscaping on the roadside	23.Epping Society	Policy should not be too prescriptive: roadside area has potential for highway/junction improvements, to ease congestion. No change to text
Policy 4: This has our support. We would like to see an additional policy which opposes the replacement of	23.Epping Society	Need list for 'local listing'

characterful established homes with blocks of flats and back-land development of closes.		
Transport & Accessibility: Policies 6,7 & 8		
Suggests extending some of the Mayor of London's Transport Strategy policy objectives to Epping – promotion of Healthy Streets, rebalancing the transport system towards walking, cycling and public transport, improving air quality and reducing road danger.	70.Transport for London	Epping is not within Greater London and does not benefit from the extent of public transport available there.
Not aware of any current proposals to extend Oyster ticketing to Roydon railway station – a matter for the operator Greater Anglia; TfL does not have any current plans or funding available to restore Central Line services beyond Epping to Ongar or North Weald Bassett – TfL recommends that specific references to extension of Central Line services is removed from the Neighbourhood Plan.	73.Transport for London	Noted Noted but recommends retaining the option for the future
The Mayor of London's approach to car parking is set out in the draft Local Plan is to limit its provision in new developments and to encourage car free developments in areas with good public transport access.	74.Transport for London	Noted – however there are different transport circumstances in Epping
As a (minor) factual point: 'the roundabout beyond the M25' is generally referred to as 'the Wake Arms roundabout'.	75.Essex CC	Noted

<p>The transport interventions being pursued is to address network issues from north of Epping through to the M25 to mitigate planned growth rather than to deal with congestion already experienced – which would take land from Epping Forest Special Area of Conservation.</p>	<p>76.Essex CC</p>	<p>Noted – given the current congestion problems, the levels of development proposed (and in EFDC SVLP) will require considerable investment.</p>
<p><u>Paragraph 6.8 – text box (p. 19)</u></p> <p>suggests add further priorities to the top of this text box: reducing the need to travel (demand management); encouraging greater use of sustainable travel modes etc. pedestrian movements need to be prioritised throughout Epping, particularly ‘desire lines’ to the station and town centre. It is noted that much of the congestion through the High Street is the result of the several pedestrian crossings leading to traffic delays. It is difficult, as a result of this, to address these resulting delays without impacting on the town centre’s economic attraction for shoppers and visitors – as pedestrians. These delays will also be exerting an existing influence on how people travel across the town, making walking and cycling more attractive options than would be the case if there were no/fewer delays.</p> <p>An extra lane at Bell Common traffic lights would need to impinge on Forest land – but on balance however (and given</p>	<p>77.Essex CC</p>	<p>Various local factors mean that cycling and walking can only ever be part of the area’s travel solutions.</p> <p>The Neighbourhood Plan notes that solutions lay outside the parish e.g. directing traffic towards the M11 in order to access London and M25.</p> <p>Removing pedestrian crossings to ease traffic flows through the town is not the solution.</p>

<p>localised air quality issues) ECC does not oppose this measure.</p> <p>ECC identifies that no bypass option is available through currently proposed growth plans for Epping.</p> <p>'Infrastructure to support South Epping' and measures re Brook Road / Bridge Hill) need to be clearer</p> <p>provision of 'improved traveller information tools' might be useful in the local context – a review of the local route signage, satnav to avoid congestion,</p> <p>'car-parking charges structured so that car-usage isn't the primary option and to reflect true costs and encourage alternative travel where feasible,' needs further consideration to identify proposals in practice. Parking availability and pricing (approached holistically) is a demand management tool not referred to in the NP as currently drafted.</p> <p>ECC acknowledges that 'worker flex-time, home working' (and other measures) can be helpful in reducing travel demand and in reducing peak time traffic movements. Such</p>		<p>Development of the Bell Hotel site provides an option to alter the junction</p> <p>Noted</p> <p>Noted – review wording of Policy 5</p> <p>Noted – this should be part of the response to local traffic issues</p> <p>Include car-parking management more clearly in the Neighbourhood Plan text of Section 6 / policy 7</p>
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<p>measures would need to be encouraged and implemented through work-place travel plans, where these are in place.</p> <p><u>Paragraph 6.10</u> focus is on road-based measures, should be on</p> <p>reducing the need to travel, and prioritising sustainable travel.</p> <p><u>Paragraph 6.11 Car Parking</u>: ECC notes that the 2nd bullet point included at paragraph 6.9 (p19), copied above, suggests a car parking measure which is not mentioned here in this car parking section.</p> <p><u>Policy 7</u> ECC advises that 600+ additional public car parking spaces in Epping will draw in more car traffic, exacerbating the congestion problems on which much of the NP content focuses.</p>		<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted – however there are few alternatives proposed by relevant agencies to address the problems, which</p>
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		will worsen during re-development of the three main town centre car parks
<p><u>Accessibility & Connectivity section (section 6) Community Aspirations (p19) paragraph 6.4</u></p> <p>Generally; this needs to reflect the sequential approach favouring sustainable travel modes in the first instance and the elements re-ordered to start from the important premise of reducing need to travel, encouraging non-car modes (walk, cycle, bus, tube, rail), and any general traffic road improvements to be last (or remove these road focused references if appropriate).</p>	78.Essex CC	Noted – however there should also be funding sought from Housing Infrastructure Fund to support new development
<p>ECC advises that there is a potentially higher expectation of the highway improvements cited in the Neighbourhood Plan, at key junctions around the town, than can demonstrably be delivered in reality, given the constraints of highway land availability etc. within the Epping Forest (much of this land instead being held by the Corporation of London).</p>	79.Essex CC	Noted – but there is little evidence of agencies' investigation of traffic demand measures, use of technology or funding from HIF (see above)
<p><u>Accessibility & Connectivity section (section 6) Community Aspirations (p19) paragraph 6.4</u></p> <p>Generally; this needs to reflect the sequential approach favouring sustainable travel modes in the first instance (see Sustainable Travel comments). Accordingly, the elements identified need to be re-ordered to start from the important premise of reducing need to travel, encouraging non-car modes (walk, cycle, bus, tube, rail), and any general traffic</p>	80.Essex CC	Alter para 6.4 to reflect travel modes

<p>road improvements to be last (or remove these road focused references if appropriate).</p> <p>1st bullet point, ECC advises that for Epping there are very few 'route options', and such real-time traffic information would be likely to lead to use of less suitable routes.</p> <p>3rd bullet point: Extending the Oyster card system coverage to Harlow or Roydon / reducing the higher fares payable from Harlow or Roydon stations (than those from Epping) is more likely to have greatest impact on reducing Epping station usage and commuter car parking demand/travel to Epping than to Roydon. ECC advises that there is also not spare capacity at Roydon station for increased car parking demand that could result from this.</p> <p>6th bullet point: Junction improvements cited are noted but do not effectively ease congestion by themselves and need to be viewed as part of a wider transport strategy. Experience from road capacity enhancement measures indicates that any additional road capacity might be taken up by existing suppressed demand and increased journeys as a result of this.</p>		<p>Noted - however the Plan notes that some solutions lay beyond the parish boundaries.</p> <p>Noted – see above</p> <p>Noted – the Neighbourhood Plan would welcome a wider transport strategy that responds to projected congestion levels</p>
<p>The SEMPA believe that new roads to serve South Epping are an integral part of development in order for the new residents and users to properly access homes and facilities.</p>	<p>81.David Lock Associates (on behalf of SEMPA)</p>	

<p>The existing pedestrian crossing over the railway could be improved to ensure a sustainable connection is provided between the eastern and western side of the South Epping Masterplan Area.</p> <p>Technical transport assessments have been undertaken that suggest only a sustainable crossing over the railway with no vehicular access would create an effective form of traffic alleviation from the existing problems along Ivy Chimney's Road, Bridge Hill and Brook Road.</p> <p>It has been suggested that a strategic link road to be used by all traffic could be provided to connect the sites to the east and west of the Central Line which form the South Epping Masterplan area. We strongly question the benefit of this link road in terms of performing the function of a southern bypass of Epping.</p> <p>We are able to provide sufficient space adjacent to the railway line within our site however, to enable a comprehensive bypass solution to be constructed in the future for the entire parish.</p> <p>There may be some merit in providing a sustainable link through the sites and across the tube line, to be used by pedestrian, cycles and public transport only, encouraging people to use more sustainable modes of transport, and thereby having a beneficial impact on the local highway network,</p>		<p>Noted</p> <p>Noted – the comment needs to be supported by evidence that the current road network – Ivy Chimneys / Brook Rd – could cope even with proposed modal shift and the anticipated levels of development</p> <p>No change – the proposal is not to create a southern bypass but to avoid added congestion on Ivy Chimneys / Brook Rd.</p> <p>Noted</p>
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		<p>This would not address a range of vehicles - services, utilities, deliveries, emergency, refuse vehicles etc. The anticipated industry growth is in electric cars – residents in an edge of town site will need good access to transport</p>
<p>agree with the problem identified in the first sentence and regard this as the predominant issue for the whole NP (and the LPSV).</p> <p>Certain junctions could be improved by using non-forest land so we recommend those options should be considered before forest is taken.</p> <p>Plus a range of measures to reduce traffic and control commuter parking</p> <p>South Epping development will spew onto existing congested roads and further exacerbate problems at the known pinch points</p> <p>a multi-storey car park at Epping Station here would serve commuters more effectively than any other solution and it might reduce demand for parking in residential roads.</p>	<p>84.Epping Society</p>	<p>Noted</p> <p>Agreed: add text Certain junctions could be improved by using non-forest land so we recommend those options should be considered before forest is taken</p> <p>Agreed</p> <p>Noted</p> <p>Agreed</p>

<p>A great deal of thought and considerable amelioration will be necessary in order to protect and improve the entrances to the town otherwise its character could be irredeemably damaged.</p>		<p>Noted</p>
<p>Town Centre Policies 9,10,11,12</p>		
<p>disagree with increasing the primary frontage, mainly because existing retailers are struggling.</p> <p>propose that Article 4 changes should exclude permitted development along primary or secondary frontage because offices are an important aspect of the town which are being lost with an adverse impact on employment.</p> <p>Design of St Johns development should be a credit to the town and not a disgrace nor a competitor to the High Street, should include A2 (professional) and D1 (for a library), plus a supermarket. The scale of development should respect existing nearby buildings however, there should not be an absolute prohibition of taller Buildings.</p>	<p>86.Epping Society</p>	<p>Review primary and secondary frontages – exclude from St John’s scheme</p> <p>Unclear what the objective would be</p> <p>New options for St John’s to be developed – to include priorities for hotel, leisure and sports and residential</p>

<p>Recommend the exclusion of ground floor residential use should be more strongly expressed.</p> <p>We ask that Article 4 ruling be applied so permitted development to residential on upper floors would be excluded in primary and secondary frontages.</p> <p>Any replacement or new shop front should be of a market town character and image.</p>		<p>Agreed – review wording</p> <p>Not agreed – upper floor residential can add vibrancy and security</p> <p>Agreed review wording</p>
<p>do not see any reason to extend the primary frontage along St John’s Road as it will tend to detract from the High Street which is the primary feature of our market town character.</p> <p>Support a town centre hotel on St John’s Road site</p>	<p>87.Epping Society</p>	<p>Review</p> <p>New options for St John’s to be developed – see above</p>

encourage a stronger promotion of the market, additional public toilets and more public seating		Agree
Suggest improved local signage to assist visitors to find the station, High Street and the forest (and other key sites too). Access to the Forest should be improved	89.Epping Society	Agreed Agreed
Employment: Policy 13		
the policy approach does not address protection and retention of existing employment uses there is not any mention of a policy with regard to resisting change of use from employment to other uses	90.Essex County Council	Review policy Add policy resisting change of use (see ES proposal for Article 4) And changes in the policy wording that state an aspiration to support the retention of existing employment areas, especially office-based employment sites and that proposals which result in the loss of an existing business use will be resisted, unless it can be demonstrated that its continued use is no longer viable

<p>the NP could usefully go further in how it would wish to see the local economy sustained and promoted with changes in the policy wording that state an aspiration to support the retention of existing employment areas, especially office-based employment sites and that proposals which result in the loss of an existing business use will be resisted, unless it can be demonstrated that its continued use is no longer viable – consistent with emerging EFDC Local Plan policies.</p>		<p>– consistent with emerging EFDC Local Plan policies. Review policy</p> <p>Add policy resisting change of use (see ES proposal for Article 4)</p> <p>And changes in the policy wording that state an aspiration to support the retention of existing employment areas, especially office-based employment sites and that proposals which result in the loss of an existing business use will be resisted, unless it can be demonstrated that its continued use is no longer viable – consistent with emerging EFDC Local Plan policies.</p>
<p>support the Town Council’s ambitions to improve the visitor economy</p>	<p>92.Epping Railway Ongar</p>	<p>Noted</p>
<p>recommend that the NP calls for use of “Article 4” designation to prevent the loss of any more central office facilities.</p> <p>Development of Steam Laundry and EFDC offices for non-employment uses conflicts with this policy area</p>	<p>93.Epping Society</p>	<p>See 90 above</p> <p>Noted – review designation</p>

<p>a number of building sites in any development area exceeding (say) 50 dwellings (not flats) should be designated for construction by local small firms.</p>		<p>This is beyond the scope of planning policy but could be added as an aspiration, but would need definition of 'local'</p>
<p>Policy 14 : Facilities</p>		
<p>Facilities should be planned on future population profiles</p> <p>strongly against any reduction in the scale or range of services available in the town, notably at St Margaret's Hospital – travel to distant hospitals would be a problem.</p> <p>An additional GP surgery is already needed in the town</p> <p>new Sports Centre should be near the town centre</p> <p>opposed to development of the library site</p> <p>proposed facilities at South Epping lack details, funding, timetable etc</p>	<p>68.Epping Society</p>	<p>Agreed</p> <p>Noted and agreed</p> <p>Noted and agreed</p> <p>Noted and agreed</p> <p>Noted – not part of Neighbourhood Plan</p> <p>Noted – to be included in Masterplanning</p>

<p>a 7-11 type store in South Epping (and, perhaps a pub) may be required,</p> <p>ask for an additional policy to withhold Permitted Development (PD) rights from any such approval in the Green Belt in order to limit possible future damage and additional, uncontrolled expansion of building footprints, volume and overlooking from loft conversions.</p> <p>Confused by additional health facility at St Margaret's</p> <p>can see no reason for additional public parking at St Margaret's</p>		<p>These comments are unlikely to be viewed as a reasonable basis for removal of PD rights.</p> <p>Noted</p> <p>Parking is viewed by the public as a major issue, this represents additional provision.</p>
<p>The town's sports facilities need to be upgraded to match new population and needs</p>	<p>Sports Clubs</p>	<p>Agreed that the future provision of sport and recreation facilities need to be updated but no case for additional sites at present.</p> <p>EFDC SVLP has sufficient sites to meet SHMA. No evidence for additional housing in Epping parish. Any</p>

		development west of Bury Lane would be a major incursion into the green belt and would require clear justification, major infrastructure and services provision and major masterplanning.
Residential Amenity: Policies 15,16 & 17		
The SEMPA supports the provision of an appropriate balance of housing types in respect to the surrounding character of the built environment in South Epping as well as the drives of market demands.	94. David Lock Associates	Noted
Policy 15 – Due regard needs to be made of the impact of increased railway operations along the branch	95.Epping Ongar Railway	Noted
<u>Policy 15</u> supports the reference to use of the (Essex) Design Guide in the interests of securing quality design and sustainability.	96.Essex County Council	Noted
extraneous noise should be guarded against as well so residents at South Epping are not troubled by the proximity of the M25. The policy should also address non-noise pollutants, such as particulates and gases.	97.Epping Society	To be included in masterplanning work

<p>Unless Article 4 is adopted the aspiration to preserve bungalows will not be possible.</p> <p>The proposal for basements is too demanding and a better solution would be to ensure developments generally and alterations do not cause unreasonable nuisance.</p>		<p>This could be considered if Housing Needs survey provides evidence of need</p> <p>Review wording of policy</p>
<p>The proposed development at Coopersale Cricket Club is promoted for between 19 and 28 dwellings, and as such affordable housing would need to be provided = sites elsewhere in the area are too small so affordable housing would not be forthcoming.</p>	<p>98.Carter Jonas LLP on behalf of Chisenhale-Marsh Estate Company</p>	<p>Noted</p>
<p>agree there needs to be a balance of housing types in the town and believe the housing market should be the normal way to resolve it. Whenever housing types are mandated or encouraged it should be with a view to variety and higher density so additional Green Belt is not consumed</p> <p>prefer a definite commitment to good design</p> <p>propose opposition generally to overdevelopment.</p>	<p>99.Epping Society</p>	<p>Noted – but conflicts with 97 – preservation of bungalows</p> <p>Agreed</p> <p>Noted – but could conflict with higher density proposals</p> <p>To be investigated</p>

<p>Theydon Grove should be made a Conservation Area</p> <p>vigorous search for valuable local buildings which should be proposed for listing. And find a way of making “local listing” more persuasive</p>		<p>Noted – would need evidence of particular qualities, heritage or architectural features</p>
<p>Heritage: Policy 18</p>		
<p>The Plan should contain a clear map that shows the boundary of the Neighbourhood Area and extent.</p> <p>We would also recommend that designated and non-designated heritage assets, such as Conservation Areas, listed buildings and Buildings of Townscape Merit etc, are illustrated on maps in appropriate locations throughout the plan.</p>	<p>104.Historic England</p>	<p>Agreed: add map showing conservation area boundaries</p>
<p>You can also use the neighbourhood plan process to identify any potential Assets of Community Value in the neighbourhood area.</p>	<p>109.Historic England</p>	<p>Noted</p>
<p>Communities that have a neighbourhood plan in force are entitled to claim 25% of Community Infrastructure Levy (CIL) funds raised from development in their area. The Localism Act 2011 allows this CIL money to be used for the</p>	<p>110.Historic England</p>	<p>Plan needs to identify how this resource could be used in delivery of Community Aspirations</p>

<p>maintenance and on-going costs associated with a range of heritage assets including, for example, transport infrastructure such as historic bridges, green and social infrastructure such as historic parks and gardens, civic spaces, and public places.</p>		
<p>Further information and guidance on how heritage can best be incorporated into Neighbourhood Plans has been produced by Historic England, including on evidence gathering, design advice and policy writing.</p>	<p>111.Historic England</p>	<p>Noted</p>
<p>regret that too many buildings of merit have been altered to their detriment or demolished because policies were not developed in time or breaches were not dealt with.</p> <p>Note that local listing has little practical effect.</p> <p>Note that public bodies can be as insensitive to preservation as developers and mention the loss of the characterful court building, likely modification of the police station and dilapidation of the Centre Point building, as well as the loss of Pearce’s Bakery and the Half Moon in the main street of the town.</p>	<p>112.Epping Society</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>

<p>Propose that smaller or even individual terraces or properties should be protected, including the Duke of Wellington (which is a classic pub building of its era, developed by Cannon Brewery Co Ltd), Hemnall Social Club, etc. Although a twentieth century structure, we consider the fire station to have merit.</p>		<p>include in review of local listing - Duke of Wellington ph, Hemnall Social Club, Fire Station</p>
<p><u>Policy 18</u></p> <p>The final sentence would be more NPPF compliant if it was positively worded instead: i.e.development of or changes of use.....<u>'will be permitted if the proposals preserve or enhance the building's historic and architectural interest'</u>.</p> <p><u>General Comments</u></p> <p>Historic Environment Characterisation has been undertaken for the entirety of Epping Forest District and this should be consulted when considering the development / implementation of the NP.</p> <p><u>Section Specific Comments</u></p> <p><u>Paragraph 11.1</u> should read</p>	<p>113.Essex County Council</p>	<p>Agreed – alter wording of Policy 18</p> <p>Add to 'Implementation'</p>

'The heritage and public realm are important factors in the distinctive appearance and unique nature of the parish. **The Essex Historic Environment Record maintains a list of all the heritage assets in Essex, both designated and undesignated. There are 134 heritage assets recorded for Epping parish, 62 of which are Listed Buildings, the Epping Forest Purlieu Bank is a Scheduled Monument and Coopersale House has a Registered Park and Garden. The remaining 70 heritage assets range from excavation sites in the town centre, to Roman metal-detecting finds to industrial archaeology associated with the railway. Historic Environment Characterisation has been undertaken for the entirety of Epping Forest District**

Policy 18

This policy needs to include all of the heritage assets as identified on the Historic Environment Record, including the below-ground archaeology and non-designated built assets, or be specifically targeted as a Conservation Area Policy, which would then require a further policy on the remaining heritage assets, in line with NPPF.

Community Aspiration (Page 38): Enhancing the Parish's Heritage and Public Realm

Agreed – change wording in 11.1

Agreed

<p>Consideration should be given to the below ground archaeology and the undesignated heritage assets within this section.</p>		<p>Noted</p>
<p>Sustainability: Policy 19</p>		
<p>pleased to note the various proposals set out in Policy 19 of the NP. The pressures on local and global environments are increasingly significant, with concerns that</p> <ol style="list-style-type: none"> 1. The Policy is couched in terms of “expectation “and “considered favourably”. The funds coming to EFDC from central government and developers’ Section 106 & CIL should make it possible to be more stringent with development, ie that such sustainable measures are “required” as a condition of planning consent ii. The NP could go further than the National Framework, for example specifying solar energy, grey water systems, bicycle store, off-street bin storage, electric vehicle recharging points, access to non-fossil public transport within 100 metres, a minimum tree density etc are requirements for any development iii. Epping South could be designed and built as an “ecovillage” incorporating all the above and more. It could become a beacon for the rest of the UK, giving the 	<p>115.Epping Society</p>	<p>Review wording of policy</p> <p>As above</p>

<p>residents and our community pride in what we will have, rather than just another edge-of-town estate.</p> <p>iv. The stress on SuDS is welcome, and we note that it should go hand-in-hand with good layout and landscaping, to create pleasant & interesting housing areas.</p> <p>v. We would like to see some of the measures of sustainability extended into the existing settlement of Epping, eg. EV charging points in the High Street and car parks and solar panels being required on all new commercial buildings.</p> <p>Most important aspect of sustainability for the near future in our community is that of transport, with traffic congestion and</p> <p>air pollution as critical constraints. If these are not addressed, other sustainability measures will be of little import.</p>		<p>To be discussed as part of maseterplanning</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>
<p>South Epping Masterplan Area will aim to achieve high levels of sustainability through measures such as extensive walking and cycle connections throughout the site, which connect to existing rights of way surrounding the site, SuDS in locations that have undergone technical assessments, a mix of dwelling types, local services and other facilities, plus infrastructure provision to integrate the area with its surroundings'</p>	<p>116.David Lock Associates.</p>	<p>Noted</p>

<p>The proposed development at Coopersale Cricket Club will meet the relevant sustainability, energy efficiency and water conservation standards. The site is located within Flood Zone 1 which means it is at low risk of flooding. It is proposed to include a balancing pond at the south-westerly corner of the site to provide on-site drainage, in order to meet sustainable drainage principles. Coopersale is served by buses which means that it is accessible to the services and facilities within Epping town centre and to Epping Station by public transport. It is also possible to walk and cycle within the village and to the nearest bus stops. Therefore, the proposed development would contribute towards reducing carbon emissions.</p>	<p>117.Carter Jonas LLP on behalf of Chisenhale-Marsh Estate Company</p>	<p>Noted</p>
<p>Sustainable Travel</p> <p><u>Policy 6</u></p> <p>ECC notes the reference in this policy to increasing car parking provision at Epping station. Whilst it has been identified that this car parking provision is under pressure for the station, any such proposals need considering in the broader context of the likely increase in car traffic on the local road network and how this needs managing / mitigating.</p> <p><u>Community Aspirations: Accessibility and Connectivity Improvements Section (P19)</u> ECC notes the bullet points</p>	<p>118.Essex CC</p>	<p>Agreed</p>

<p>that mention increases in road capacity, such as extra lanes. Increasing the road capacity has the potential to induce a greater net traffic flow, so any such road capacity increase measures need to be set within a broader strategic transport approach. The ECC approach is summarised as follows in the ECC Developers' Guide to Infrastructure Contributions:</p> <p><i>'When identifying solutions, priority must be given to promoting 'smarter choices' i.e. alternatives to private car use and those that make efficient use of the transport network. Essex County Council employs a sequential test under which measures such as travel planning will be looked at first, then schemes designed to enhance walking and cycling, followed by public transport enhancement and then highway works. In mitigating the impact of a development on the highway network, direct mitigation by the developer is preferred.'</i></p> <p><u>Paragraph 6.13 (p22)</u> This deals with car parking improvements and in this context ECC advises of the need to ensure that the North Essex Parking Partnership (NEPP) is consulted with regard to parking policy and delivery arrangements.</p> <p><u>Policy 8 (p22)</u> This reflects the NP proposals for 20mph speed limits on roads around schools. This proposal needs</p>		<p>Noted – however other comments doubt the effectiveness of travel planning / traffic management in Epping's situation</p> <p>Agreed</p>
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<p>to be approached with consideration of the means and availability of resources to police and enforce the 20mph speed limits.</p>		<p>Noted</p>
<p>TW have commented on the emerging Epping Forest Local Plan and support the inclusion within the Local Plan of Policy DM15 in relation to flood risk, DM16 regarding surface water drainage and DM18 in relation to water and wastewater infrastructure although some amendments have been put forward in relation to Policy DM18. For clarity of requirements it may be beneficial to include cross-references to these policies in the sustainability chapter of the Neighbourhood Plan.</p>	<p>48.Thames Water</p>	<p>Include cross-reference in text</p>
<p>ECC Minerals and Waste Planning Role – Overview and Safeguarding Minerals Development</p> <p>extant policy is set out within the Essex Minerals Local Plan (MLP) (adopted 2014). In respect of waste planning issues, extant policy is set out within the Essex and Southend-on-Sea Waste Local Plan (WLP) (adopted 2017). The WLP includes site allocations and policies to guide future waste development in Essex up to 2032.</p> <p><u>Paragraph 2.4</u></p>	<p>119.Essex County Council</p>	<p>Noted</p>

<p>The third bullet point refers to the 2001 Waste Local Plan. This Plan was superseded by a new Essex and Southend-on Sea Waste Local Plan in 2017.</p> <p>No comment on sites allocated.</p>		<p>Noted – amend para 2.4</p> <p>Noted</p>
<p>Area fronting Birch View may be Corporation of London land (2)</p>	<p>120.Individual comment</p>	<p>Noted</p>
<p>Former Police Station – sold</p> <p>essential services are leaving the town</p>	<p>123.Individual comment</p>	<p>Noted – omit Police Station from policy 3</p>
<p>Review / improve photos used to illustrate issues and policies</p>	<p>124.Individual comment</p>	<p>Noted</p>
<p>map 1 – the colours used are not clear. Perhaps use different colours and or dots/dashes to make clear?</p>	<p>125.Individual comment</p>	<p>Noted</p>
<p>Page 22 6.13 explain acronym ANPR on first use</p>	<p>126.Individual comment</p>	<p>Noted – amend ANPR to full words</p>

Page 46 - higher density on Underground car park and the St Johns site?	127.Individual comment	Add to review of proposals