

21 April 2020

## Annex N

Civic Offices  
High Street  
Epping  
Essex  
CM16 4BZ

Beverley Rumsey  
Epping Town Council  
Epping Hall  
St John's Road  
Epping  
CM16 5JU

### **Subject: Epping Forest District Council's Response to the Draft Epping Town Neighbourhood Plan**

Dear Ms Rumsey

Thank you for inviting the District Council to comment informally on the Draft Epping Town Neighbourhood Plan v11.

As you know, the Council previously responded to the Draft Epping Town Neighbourhood Plan, which was published for consultation under regulation 14(c) of the Neighbourhood Planning (General) Regulations 2012("the Regulations") in June 2018. The Council's letter of 24 July 2018, which accompanied the more detailed comments in response to the Regulation 14 version of the Neighbourhood Plan, explained that the Neighbourhood Plan will need to meet a number of basic conditions in order for it to be made; referred to the possible need for a Strategic Environmental Assessment; highlighted issues relating to the Epping Forest SAC; raised concerns on draft policies that could restrict development, the surrounding Local Green Space and proposed wildlife corridors; and commented upon the structure of the Draft Plan. The detail of those comments is not repeated here.

Since July 2018, the Epping Forest District Local Plan has progressed. Examination Hearings took place between February and June 2019 and the Inspector issued her Initial Advice letter on 2 August 2019 following the conclusion of those hearings. We would refer you to the Inspector's Initial Advice Letter, which can be found in the Local Plan Examination Library (<https://www.efdclocalplan.org/>) as document ED98, as this contains information pertinent to the progression of the Neighbourhood Plan.

Of particular relevance are Actions 19 and 20. Action 19 requires the District Council to undertake further work in relation to the South Epping Masterplan Area (EPP.R1 and EPP.R2 in the Local Plan Submission Version 2017) by reviewing the capacity work for the sites taking detailed account of site constraints and to consider the delivery of the bridge. The District Council is currently undertaking this piece of work and the outcomes of this will

need to be reflected in the Neighbourhood Plan and the necessary policies and supporting text updated. Action 20 requires the District Council to prepare main modifications in relation to Land at St John's Road (EPP.R4) and the Civic Offices (EPP.R8) in accordance with advice in paragraph 46 of the Inspector's letter.

The District Council is concerned that some of the policies and supporting text in the Neighbourhood Plan have an emphasis on encouraging visitors to the Epping Forest or which may result in a net increase in traffic movements through the Forest, including paragraph 4.1, Policy 1, Policy 7 and Policy 13. Given the need to mitigate the impact of growth on the Epping Forest Special Area of Conservation and the need to put in place a mitigation Strategy which aims to reduce recreational pressure and the impact on air quality on the Forest, some of the proposed policies in the NP will require further consideration. More detailed comments are included in the table appended to this letter.

The comments in the table build upon the table of comments submitted as part of the District Council's Regulation 14 response. There have been limited changes to the Neighbourhood Plan between the Regulation 14 (v10) and the current (v11) version of the Plan and therefore many of the previous comments remain relevant and are maintained by the District Council. However, some updates have been made with regards to the District Council's comments and potential actions of July 2018 to reflect the current position of the Epping Forest District Local Plan following the examination hearings or where matters have progressed. For ease of reference, these are shown in bold text where there are additions and italic text where there have been some amendments. The text in blue shows additional comments the District Council now wishes to make in relation to the v11 copy of the Plan.

The District Council hopes that the additional comments provided in this response are helpful and we look forward to working with Epping Town Council and the Neighbourhood Planning Advisory Committee on the Neighbourhood Plan as it is further progressed, in the forthcoming masterplanning work for the South Epping Masterplan Area and in the proposals for the key sites within the Town Centre.

The Council reserves its right to make representations on any forthcoming version of the Neighbourhood Plan submitted for publication in accordance with Regulation 16 of the Regulations, as well as come to a view as to whether the Neighbourhood Plan meets the basic conditions once any independent examination has taken place, after the examiner's report is received and once any modifications recommended by the examiner have been addressed by the Town Council.

We would be happy to discuss the comments below and propose a meeting in the week commencing 11<sup>th</sup> or 18<sup>th</sup> May 2020. Please could you let us know your availability.

Yours Sincerely

*L. Ciavucco*

Loredana Ciavucco

Planning Policy Officer

No.	Page Number / Policy Number	Comments	Potential Action
1	2. The Big Picture Pages 6-8	<p>The Council welcomes the reference to the District Council's Local Plan to contextualise the Neighbourhood Plan.</p> <p>Paragraph 2.9 incorrectly states that further work is being carried out to identify employment allocations – this took place during the preparation of the LPSV.</p>	<p>The Council advises that ETC only refer to the LPSV as this is the most up-to-date version of the Plan and has superseded the Draft Local Plan 2016.</p> <p>ETC can update Paragraph 2.9 to state that employment allocations are included in the LPSV.  <a href="#">This section is very dated and previous comments are yet to be actioned.</a></p>
2	3. Vision and Aims Pages 9-10	<p>The Council welcomes ETC's vision for Epping.</p>	<p>None.</p>
3	<p>4. The Forest, Green Belt and Natural Environment</p> <p><b>Policy 1: Protection of the Forest and the Green Belt</b>            Pages 11-12</p>	<p>The map showing the Green Belt boundary for Epping accords with the proposed Green Belt boundary alterations included in the LPSV for Epping, therefore it may be beneficial to clarify that the NP is / is not proposing GB boundary alterations but rather reflecting those in the Local Plan once adopted.</p> <p><b>The wording “<i>Within the Green Belt boundaries shown in Map 1, no further development will be permitted</i>” could be interpreted to mean that no forms of development within the boundaries of the Green Belt as shown will be permitted. If this is correct, then this does not have regard to national policy for sustainable development and Green Belt, nor is it in general conformity with the Local Plan. Development Plans do not have the power to stop all development in the Green Belt.</b></p> <p>It is not clear what is meant by “<i>in exchange for land required for access improvements</i>”. Does this mean transferring ownership of the land to the City of London Corporation, or the right to use the land? We have some concerns about the deliverability of this part of the policy, as we understand this has not been discussed with the Conservators of Epping Forest.</p>	<p>The Council advises that ETC clarify whether or not it is proposing Green Belt boundary alterations in the NP, or whether it is reflecting the alterations set out in the Local Plan (once adopted).</p> <p>The Council advises that the part of the policy prohibiting development in the Green Belt is reworded to afford appropriate protection to the Green Belt in line with the NPPF and the relevant policies in the LPSV, being mindful that national policy does allow for some types of development in the Green Belt for instance agricultural use, development on brownfield land, through permitted development rights and where there are ‘very special circumstances’.</p> <p>The Council has not agreed the exchange of Forest land with the Conservators. We recommend that further engagement / negotiation is had before including this in the NP.</p> <p><i>The Council advises ETC to look at the Council's Open Space Study and the Draft Green Infrastructure Strategy as these may provide useful evidence to help implement the footpath improvements proposed in this policy.</i></p> <p>The Council notes that it is important to be mindful of the work being done at a District level on protecting the SAC and mitigating the recreational impact on the Forest.</p> <p><a href="#">This is yet to be actioned. The Council's comments of July 2018 remain. ETC may wish also to refer to the Council's draft Green Infrastructure Strategy which was considered by Cabinet on 15 April 2020 and will be the subject of consultation.</a></p>
4	<p>4. The Forest, Green Belt and Natural Environment</p> <p><b>Policy 2: Protect and enhance open space within the Parish</b>            Pages 11-12</p>	<p><b>Local Green Spaces:</b> The Council notes the aspirations of ETC to protect the green spaces of Epping by designating them as Local Green Spaces. The policy tests (NPPF para 77) and Government advice for designating LGS includes:</p> <ul style="list-style-type: none"> <li>• That the area of land should not be extensive, and must be local in character</li> <li>• It should be demonstrably special – for most open spaces it will not be appropriate to designate them as LGS</li> <li>• It should be supported by robust and compelling evidence</li> <li>• It should be carefully considered whether LGS designation is required in order to protect the site from development. The site may already be protected by virtue of another designation in a Local Plan or other planning designation, e.g. Local Wildlife Site, Green Belt etc.</li> </ul> <p>Currently it is not clear what the evidence is to designate the proposed LGS in relation to the above points, and we are concerned that some of the areas, such as at</p>	<p>Further detailed justification and evidence for the Local Green Space designations is needed. This could be in the form of a supporting document – rather like a ‘Background Paper’ which sets out the case for LGS designations, includes robust and compelling evidence, and potentially a ‘checklist’ type exercise against the requirements set out in national policy and guidance. This need not be an excessively onerous exercise, and we can provide guidance if that would be helpful.</p> <p>The Council advises the ETC to look at the District Open Space Study (2017). This is the main evidence the Council has on open spaces across the District and has informed the LPSV. It includes an appraisal of the various open spaces and a series of recommendations for Epping. This may provide useful evidence for this policy. <a href="http://www.efdclocalplan.org/wp-content/uploads/2018/02/EB703-Open-Space-Strategy-4-Global-2017.pdf">http://www.efdclocalplan.org/wp-content/uploads/2018/02/EB703-Open-Space-Strategy-4-Global-2017.pdf</a></p>

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		<p>Stonards Hill, could be considered ‘extensive’ in area. Additionally, Swaine’s Lane is designated as a Local Wildlife Site and is Metropolitan Green Belt.</p> <p><b>Wildlife Green Corridors:</b> The Council recognises and supports the aspirations of this policy with regards to wildlife green corridors. This aligns with Policy SP 7 in the LPSV which states that the Council aims to create a comprehensive network of green and blue corridors.</p> <p>We have some concerns, however, as to whether there is sufficient evidence to support the location and extent of the green corridors as they have been identified, and the deliverability of the policy as the corridors cover areas of land that are primarily in private ownership and in agricultural use where new development is not proposed.</p> <p>As above, the policy requirement stating that ‘no change will be permitted other than in very special circumstances’ is not in general conformity with national policy or the LPSV, and is not consistent with the objectives of delivering sustainable development.</p> <p>It is slightly unclear what relationship the different open space, priority area, wildlife corridor designations have to each other, and whether there is a hierarchy – i.e. are some designations more important / afforded more protection than others? Some are identified on the key diagram map, and others not.</p> <p><i>The Proposed Wildlife Corridors have been removed from the Key Diagram on page 20 (with the exception of the South Epping Masterplan Area) but are still listed in Policy 2. Is it the intention that the Proposed Wildlife Corridors are removed? It is not clear.</i></p>	<p>Government advice on designating LGS can be found here: <a href="https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space#Local-Green-Space-designation">https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space#Local-Green-Space-designation</a></p> <p>It is entirely appropriate, and is supported, for a Neighbourhood Plan to set out how policies in a District ‘Local Plan’ are to be articulated and interpreted at the scale of a town or village, therefore we would suggest linking the identification of these corridors to the Local Plan policy SP 7 – where there is good evidence, there is value in identifying these in the NP in order to assist in the determination of planning applications and negotiation of planning contributions.</p> <p>The identification of the location of a ‘green corridor’ through the South Epping Masterplan Area is in principle supported. Clearly, we will need to work closely with the Town Council and the site promoters to understand how this should be accommodated within the strategic masterplan, and further understanding the rationale and justification for the corridor.</p> <p>The Council would suggest that you engage with the Countrycare Team at EFDC and/or Essex Wildlife Trust to see what evidence currently exists with respect to biodiversity and habitats around Epping, to help define the wildlife corridors and the wording of the policy. Note that the Conservators of Epping Forest, in their response to the District’s LPSV, state that a protected green infrastructure corridor is required around the west of Epping, with connections to the River Roding to the south-east.</p> <p>We would suggest that further clarity is provided as to the aims of the policy, and how it will function / be delivered. If the focus is on prohibiting development within these areas, you may wish to consider whether this policy protection is indeed required, as the land is already designated as Green Belt. If it is more about enhancing biodiversity / habitat or accessibility, it may be useful to set this out clearly.</p> <p><i>Further detailed justification and evidence for the designation of Local Green Space is yet to be provided to the Town Council. The Council’s comments of July 2018 remain.</i></p>
5	5. Epping’s Growth and Development <b>Policy 3: Development Proposals</b> Pages 13-16	<p><i>The explanatory text at paragraphs 5.1 and 5.2 refers to the ‘Pre Submission Draft’ of the Local Plan and that the ‘Neighbourhood Plan reflects the allocation in the EFDC Pre Submission’. Given that this has now progressed, and the Local Plan Submission Version 2017 has been published, this should be updated and any consequential amendments made.</i></p> <p>The proposed allocations are largely consistent with those in the LPSV, and as such the Council supports the NP’s approach to site allocations in general terms, with the exception of the points set out below.</p> <p>The Council notes the following regarding sites which were considered by EFDC in preparing the LPSV:</p> <ul style="list-style-type: none"> <li>Epping Sanitary Steam and Laundry Bower Vale (EPP.R9) is allocated in the LPSV for housing and in NP as a mix of homes and a public car park. We are concerned about the deliverability of the car parking element. See also our response to Policy 7 on parking provision.</li> <li><b>The Civic Offices site (EPP.R8) is allocated in the LPSV for housing and in the NP for housing with potential community facilities and relocation of library. It is likely that the community facilities will be provided on the St John’s Road site (EPP.R4)</b></li> </ul>	<p><i>Further discussion with ETC is suggested to discuss the site allocations in the NP. A NP cannot ‘undo’ the allocations set out in the District’s Local Plan. It can however add further clarity or propose additional allocations where this is in general conformity with the strategic policies in the Local Plan. Therefore, wherever possible, the Council and ETC should work together to align the allocations in the Local Plan and the NP. This is particularly relevant for sites which are being proposed for allocation in the NP that would impact the deliverability of the site as a whole, or result in a reduction in site capacity, and is also relevant given the Epping Forest SAC issue set out below.</i></p> <p><i>Please note that for a NP making housing allocations, Habitat Regulations Assessment and a screening for SEA will be required. It is likely that an initial screening assessment will identify the potential for significant environmental effects (in line with the Local Plan HRA) and an SEA will be required. In line with the SEA regulations a report must be published for consultation alongside the draft Plan that assesses the likely significant effects of implementing the Plan and reasonable alternatives. The Council is working in partnership with Natural England and the Conservators of Epping Forest to develop a Mitigation Strategy to make sure that development in the District does not result in significant effects on the Epping forest SAC (in respect of both air quality and recreational pressure). Should the NP allocations fall in line with those in the Local Plan, then the District-wide HRA and mitigation strategy should provide sufficient evidence to support the allocations. However, where there are additional sites allocated (as in the case of this draft NP which proposes the allocation of</i></p>

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		<ul style="list-style-type: none"> <li>Epping Sports Centre (EPP.R5) is allocated in the LPSV. The NP allocates the site stating that development can come forward “only after a new sport/leisure centre is built within Epping”. <b>This has now been agreed by the Council.</b></li> <li>Epping Underground Station and car park (EPP.R3) is allocated in the LPSV for housing led development. We have some concerns regarding the deliverability of the requirement for ‘an improved station’ which is covered in our response to Policy 6.</li> </ul>	<p><i>the Bell Hotel site), these sites will not be covered by the Council’s HRA or mitigation strategy, and therefore a further HRA will be required. The Council wishes to work proactively with ETC and other partners to resolve this issue.</i></p> <p>In addition to the assessment criteria at Annex A, the Council would suggest that the ETC publish evidence setting out how the sites were assessed against these criteria including the reasoning and justification for the selection of sites, and the site requirements, in particular where they differ from those in the LPSV. Through the site selection process, the Council has gathered a significant amount of evidence for many sites promoted throughout the District, which may be helpful. See ‘Site Selection 2018’ here: <a href="http://www.efdclocalplan.org/local-plan/evidence-base/">http://www.efdclocalplan.org/local-plan/evidence-base/</a></p> <p>Note also that the Conservators of Epping Forest have objected to some of the proposed housing allocations in the LPSV, and in particular South of Epping Masterplan Area due to potential traffic generation leading to air quality impacts, and recreation impacts on the Forest and its buffer lands and that the Inspector has made recommendations in respect of South Epping Masterplan Area .</p> <p>An amendment has been made to propose the Civic Offices site (EPP.R9) for residential use rather than a hotel which is consistent with the LPSV.</p> <p>The Council welcomes the removal of the St Margaret’s Hospital site from the NP. This alleviates previous concerns the District Council had relating to evidence indicating the site may not be available in the plan period due to uncertainties about the existing hospital use ceasing.</p> <p>The allocation of the former Police Station has also been removed as an allocation in the NP. This alleviates previous concerns that there was no evidence provided setting out the assessment of the site.</p>
		<p><b>Bell Hotel site</b> – No evidence has been published setting out the relative merits / negatives about this site in planning terms to help inform the proposed allocation. This site is in close proximity to Epping Forest SAC, and proximity to the Bell Common Air Quality Management Area means that the Council cannot currently support this allocation – we reserve the right to make further comments on this once responses have been seen from statutory consultees regarding the potential impact of this site. <b>The Council will need to be satisfied that any development on this site will not result in a net increase in vehicular movements through the Forest.</b></p> <p>Policy E 4 ‘The Visitor Economy’ of the LPSV seeks to protect existing visitor accommodation unless there is robust evidence provided that there is no market interest in acquisition and investment to allow continued profitable operation.</p> <p>It is acknowledged that this site is located within the Green Belt. It is previously developed (brownfield) land which means that residential development may be supported, however the text in the allocation policy should reflect the current provision in the NPPF for development in the GB - that the design of any development on the site must not have greater impact on the openness of the Green Belt. Note that the revised NPPF includes a change to allow brownfield land in the Green Belt to be used for residential development that contributes to meeting affordable housing needs, where there is no <b>substantial</b> harm to openness.</p>	<p>The Council advises the ETC to publish evidence justifying the allocation of this site, as well as providing clarity on the Green Belt implications for the allocation.</p> <p>Evidence justifying the allocation of this site is yet to be provided to the Council. The Council’s comments of July 2018 remain.</p>

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		<p>The Council queries the inclusion within the third paragraph of Policy 3, of the clauses referring to an Affordable Housing SPD and the requirement for affordable housing provision to meet local needs. The Council is not currently planning to produce an Affordable Housing SPD, as the requirement for affordable housing is set out clearly in policy H 2 of the LPSV, requiring that schemes of 11 or more dwellings must provide at least 40% of the dwellings as affordable homes. The wording of the policy 'pending' implies that a different approach should be employed in Epping, or that Epping has very different affordable housing needs than elsewhere, which we do not believe to be the case.</p> <p>Map 1 Key Diagram The key diagram on page 20 shows ten proposed residential site allocations whilst Policy 3: Development Proposals only lists 8 sites.</p> <p>The legend shows Employment Site Allocations however through the LPSV Examination, the Council is proposing a Main Modification to differentiate between Employment Designations and Employment Allocations. As the Employment sites in Epping are existing employment designations, they should be described as such.</p>	<p>The Council advises ETC to remove reference to an Affordable Housing SPD, and the following text: "Subject to the outcome of the needs assessment and an assessment of viability, the threshold and/or level of affordable housing to be provided in residential developments in Epping will be amended in line with the identified needs of local people."</p> <p>Policies H 1 Housing Mix and Accommodation Types, H 2 Affordable Housing and H 3 Rural Exceptions in the LPSV all make reference to the need for development proposals to meet the housing needs for the local area in terms tenure type, unit size mix, adaptable homes etc., having regard to local demographics and existing housing stock and the need to support mixed and balanced communities.</p> <p>The policies in the LPSV put the onus on the applicant to provide evidence as to what the need is in the local area, however it is entirely appropriate for a Neighbourhood Planning group such as ETC, through the preparation of a NP, to prepare its own evidence of housing need and viability in the area. If this evidence is referenced in the NP, it can then be used to assess whether applicant's development proposals do meet the local needs of Epping in particular. Should ETC wish to prepare such evidence, we would recommend that they set out in the policy a requirement for applicants to demonstrate that development proposals meet local need, having regard to the Town Council's / Neighbourhood Plan's evidence document [title and date of document] where appropriate.</p> <p>This is yet to be actioned. The District Council's comments of July 2018 remain.</p> <p>The Council suggests this needs to be made clearer. If sites are shown on the key diagram map, then they should be listed in Policy 3 and if the sites are not proposed for allocation then they should be removed from the key diagram map. The legend should read 'Employment Site Designations' rather than 'Employment Site Allocations'.</p>
6	5. Epping's Growth and Development <b>Policy 4</b> Pages 13-16	None	Policy 4 has been positively reworded and has removed reference to limiting the scale of future development to 5 units. This has alleviated the Council's previous concerns that the policy would not meet the basic conditions as it did not accord with the NPPF presumption in favour of sustainable development.
7	5. Epping's Growth and Development <b>Policy 5</b> Pages 13-16	<p>The requirements set out in Policy 5 are generally consistent with the LPSV.</p> <p>We welcome the detail provided in the supporting text on new highways and junction improvements as well as the wildlife green corridor that will be required as part of the development. This provides really important locally specific detail that can be used to inform masterplans, development proposals and seek contributions from developers. Further work will be required through the masterplanning process and through engagement with ECC Highways and other stakeholders to make sure these are evidenced and deliverable.</p> <p>We support the principle of early delivery of the infrastructure requirements, however it is unlikely to be feasible for all infrastructure to be delivered before the first homes</p>	<p>The Council welcomes this policy and looks forward to continued discussion through engagement with the South Epping Strategic Masterplan.</p> <p>As part of the examination of the LPSV, during the hearing sessions the Inspector raised concerns with regards to the South Epping Masterplan Area (EPP.R1 and EPP.R2). The Inspector's Advice dated 2 August 2019, following the hearing sessions, advised the Council to undertake further work to review the site capacity work for EPP.R1 and EPP.R2 taking into account the sites' constraints. The Council is currently undertaking this work and once complete, the outcomes should be reflected in the Epping Town Draft Neighbourhood Plan and the relevant policies and supporting text updated.</p> <p>A link to the District Council's Strategic Masterplanning Briefing Note has been included below should the Town Council wish to draw on this.</p>

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		<p>are delivered on site. The Council's IDP sets out what infrastructure is deemed critical, essential and desirable, and the masterplanning process should also provide a means to securing the phasing of the various highways and infrastructure interventions. As a result of the advice from the Inspector further work is underway to consolidate and update the IDP.</p>	<p><a href="https://www.eppingforestdc.gov.uk/wp-content/uploads/2019/06/Strategic-Masterplanning-Briefing-Note-Endorsed.pdf">https://www.eppingforestdc.gov.uk/wp-content/uploads/2019/06/Strategic-Masterplanning-Briefing-Note-Endorsed.pdf</a></p>
8	<p>6. Accessibility and Connectivity <b>Policy 6: Enhancing Epping Station</b> Pages 17-24</p>	<p>The Council welcomes the aspiration for significant improvements at Epping Station as part of the development of this site allocation. The wording of the policy ('improved station' and 'station redevelopment') implies that wholesale redevelopment of the station building and platforms is being proposed, which would be difficult to support given that the station building is locally listed, and is also highly dependent on TfL's investment plans.</p> <p>The Council's Infrastructure Delivery Plan identifies some station enhancements at Epping Station including improved bus facilities, charging points and access to the station. Policy requirements for this site (EPP.R3) in Appendix 6 of the LPSV set out requirements for a Design Brief to be prepared for the site to deliver improvements to Station approach and the junction and an integrated station forecourt transport interchange with retail at ground floor.</p>	<p>The Council is supportive of the aspirations for the station area and approach set out in this policy and the proposed design brief approach. The principle of enhancements to the station itself is in line with the Infrastructure Delivery Plan and the LPSV. However, it is suggested that changes to the wording of the policy are made to indicate that the loss of the original locally listed station building would not be supported. Early engagement with TfL regarding ETC's aspirations for the station is suggested.</p> <p><i>Suggestion from the Council is yet to be actioned. The Council's comments of July 2018 remain.</i></p>
9	<p>6. Accessibility and Connectivity <b>Policy 7: Car Parking Provision</b> Pages 17-24</p>	<p>The LPSV's approach to transport is to encourage sustainable modes of transport wherever possible. Policy T 1 of the LPSV includes provision to reduce the need to travel, increase sustainable transport modes and promote transport choice. Therefore, the Council has some concerns regarding the focus on providing five additional public car parks in the town, as this does not support a move towards more sustainable transport modes. <b>In addition this is likely to have an impact in terms of additional net traffic movements through the Forest which have not been included in the traffic and air quality modelling to support the Habitat Regulations Assessment for Epping Forest SAC and will impact on the air quality of the Forest.</b></p>	<p>The Council advises that ETC review this policy against the sustainable transport approach included in the LPSV and national policy. The Council is happy to discuss the approach to parking in the NP with ETC.</p> <p>Following adoption of the Local Plan, the Council is intending to develop car parking standards across the District which will be locally specific to the different parts of the District. We would like to work with ETC to develop standards for this part of the District in due course.</p> <p><i>This is yet to be actioned. The Council's comments of July 2018 remain. The Council also suggests a broader appreciation of sustainable transport modes such as the provision of car clubs and car sharing, inclusion of cycle storage.</i></p>
10	<p>6. Accessibility and Connectivity <b>Policy 8: Paths to the Forest</b> Pages 17-24</p>	<p>The Council is supportive of ETC's aspirations to improve pedestrian routes in Epping, however note that the aspirations for creating better access to Epping Forest should be balanced with the need to mitigate recreational impacts on the Forest which is a key concern for the Conservators, as well as Natural England.</p> <p>A key factor in reducing recreational impacts on the forest is by providing new alternative natural green space (SANG), and by improving access to existing natural green spaces and the wider countryside – this is particularly important for encouraging dog-walkers to use other natural green spaces rather than the forest. Therefore, we would be suggest that the policy is expanded to include additional greenway connections to other open space sites and the wider countryside, for instance more east-west connections, to support the use of alternatives to Epping Forest.</p>	<p><i>The Council advises that ETC engage with the Council who are working with the Conservators of Epping Forest and Natural England and other relevant authorities (such as Waltham Forest and Redbridge) who are working in partnership to update the interim mitigation strategy through the provision of SAMMS measures and SANG to address the recreational impacts on the forest. To support this an updated visitor survey has recently been completed. ETC need to understand how the proposed Greenways align with their proposals and the Council's Draft Green Infrastructure Strategy. It is suggested that ETC explore opportunities to expand the scope of the Greenways to include access to other open space sites and the wider countryside, not just Epping Forest, and particularly look at east-west routes as well as north-south. Are there existing Public Rights of Way that could be enhanced, or new sections of footpath / PROWs that could be created? These could be included in the Green Infrastructure Strategy.</i></p> <p><b>For clarity the policy title should be renamed 'Greenways', rather than 'Paths to the Forest' in order to be consistent with the wording in the policy itself and the supporting text and given the sensitivities which surround recreational use of Epping Forest.</b></p>

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			This is yet to be actioned. The Council's comments of July 2018 remain as amended above.
11	7. Epping Town Centre <b>Policy 9 Epping Town Centre</b> Pages 25-28	The primary and secondary frontage shown in the NP mirrors that shown in the LPSV, as do the requirements for percentages of frontages to stay in primary/secondary.	For clarity, you may wish to combine this policy with Policy 11 as they both deal with Epping Town Centre.
12	7. Epping Town Centre <b>Policy 10 St John's</b> Pages 25-28	<p>The St John's Road Design and Development Brief has been endorsed by the Council and therefore is a material planning consideration and the majority of the provisions within this policy are in line with the endorsed brief.</p> <p>We support the aspirations of the policy to ensure that development at St John's respects and enhances the character of the area in terms of scale and height, we are concerned that limiting new development to three storeys is overly restrictive.</p>	<p>Reference to a 'major quality food store' has been removed from paragraph 7.5 which alleviates previous concerns.</p> <p>The Council has since undertaken additional work (see report to Cabinet in December 2018) which approved a brief including the provision of residential accommodation, a leisure centre (including swimming pool), together with a cinema and associated retail provision. Consultants White Young Green were commissioned to undertake this work and the outcomes were summarised in a report to Cabinet in January 2020. A report to Cabinet on 26 March 2020 is proposing the transfer of the site to Qualis Commercial to take forward the development. Proposals will be brought forward which will be the subject of consultation and ETC will be involved.</p>
13	7. Epping Town Centre <b>Policy 11 Sustaining and Enhancing Epping Town Centre</b> Pages 25-28	This policy is in line with Policy E 2 of the LPSV which supports retail, leisure, entertainments, offices, arts and culture, tourism and other main town centre uses while maintaining vitality.	For clarity, you may wish to combine this policy with Policy 9 as they both deal with Epping Town Centre.
14	7. Epping Town Centre Policy 12 Shopfront Improvements Pages 25-28	This policy is in line with the LPSV Policy DM 14 which also seeks to ensure that shopfronts and associated features are designed to a high standard and contribute to a safe and attractive environment.	None.
15	8. Business and Employment <b>Policy 13</b> Pages 30-31	This policy is in line with the LPSV Policies E1 and E4 on encouraging appropriate employment development within the District and encouraging the visitor economy.	The Council suggests also making reference to the further three employment designations within Epping as well as Bower Hill.
16	9. Local Facilities for Arts, Culture and Recreation <b>Policy 14 Enhancing social, sporting, play, cultural and community facilities</b> Pages 32-33	The Council welcomes the reference to the LPSV's approach in this policy and notes the facilities listed by ETC. We also welcome the principle of creating a combined health-hub. Engagement with the NHS trust / Clinical Commissioning Group is advised.	<p>None.</p> <p>Reference to development at St Margaret's has now been removed. We assume the site is no longer being proposed for residential allocation as reference to it has also been removed from paragraphs 5.6, 5.9, 5.11, Policy 7, Policy 14 etc. however is still shown on the key diagram. Please can the TC confirm if this is the case and if so, it should be removed from the key diagram.</p>



No.	Page Number / Policy Number	Comments	Potential Action
17	10. Enhancing the lives of local residents <b>Policy 15 Protecting Residential Amenity</b> Pages 34-35	This policy is generally consistent with LPSV Policy DM 9 on high quality design. We are concerned however that using the wording ‘match the character...’ may be overly restrictive. This may give rise to overly derivative / unimaginative design that simply mimics features nearby, rather than responding positively to a site’s context and may not support the potential for high quality architecture which is innovative / different in style from surrounding development. <b>At present, we would have concerns that this policy runs counter to the objective of paragraph 127 (c) of the NPPF: ‘planning policies and decisions should ensure that developments are sympathetic to local character and history including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change...’</b>	The wording of this policy should be reviewed to make it less restrictive – particularly ‘match the character...’. A possible alternative wording could be ‘development proposals will be supported where they are sympathetic to the design qualities and character of the local area / vicinity of the site.’  The NP can have a role to provide a more locally specific interpretation of character and high-quality design as requirement by policy DM 9 in the LPSV. You may wish to expand on Policy 15 and its supporting text to explore in more detail what the constituent elements of the character of Epping in particular are – such as urban structure and grain, height and massing, building types, façade and interface, details and materials and streetscape and landscaping. Linking this to the character appraisals (annex C) as your main source of evidence could help strengthen this policy.  <a href="#">The TC has amended wording to reference specifically the Essex Design Guide. The Council’s suggestion to review and expand parts of the policy are yet to be actioned.</a>
18	10. Enhancing the lives of local residents <b>Policy 16</b> Pages 34-35	Parts of the policy are in line with LPSV Policies H 1 and DM 13.  The presumption against the conversion of garages to residential dwellings causes concern – The NPPF (paragraph 111) and the LPSV place great importance on the need to make the effective use of land, particularly in this District where undeveloped urban (i.e. non-Green Belt) land is so limited. Garage sites can, and do, provide an important source of land for much needed new housing.	The Council would suggest that the part of the policy protecting garages from redevelopment is removed.  The Council would suggest the removal of the part of the policy relating to basements as this is covered by policy DM 12 in the LPSV.
19	10. Enhancing the lives of local residents Policy 17 Sustaining and enhancing Coopersale Pages 34-35	The Council is supportive of ETC’s aspiration to promote retail uses in Coopersale.  <a href="#">The policy refers to Map 1 for the location and extent of Coopersale shops however Map 1 only extends to the east of St Margaret’s hospital and therefore excludes Coopersale.</a>	<a href="#">The Council suggests checking the mapping to ensure it aligns with wording in the policy.</a>
20	11. Heritage, Historic Buildings and Public Realm <b>Policy 18: protecting the Parish’s Heritage Assets</b> Pages 36-38	The LPSV protects heritage assets and encourages sensitive design through Policies DM 7, DM 8 and DM 9. The Council supports ETC’s protection of key buildings of interest and commitment to maintaining and enhancing the heritage offer of Epping.  We support the aspiration to review the Conservation Areas in Epping, however this is not strictly a land use policy, therefore may be more appropriate to be moved to the supporting text.  It is not clear what the ‘community aspirations’ box on page 38 adds. Much of this could be given more weight if it were moved to policy 18, policy 15 or otherwise moved to the supporting text.	The Council would like to discuss the proposals to review and updated the Conservation Area appraisal management plans for Epping, and the proposed list of Buildings of Townscape Merit to explore whether these could also warrant being added to the Council’s local list.  <a href="#">Suggestions from the Council are yet to be actioned. The comments of July 2018 remain.</a>
21	12. Sustainability <b>Policy 19</b> Page 39	The Council welcomes ETC’s commitment to environmental sustainability.	The principle of the policy is supported. However, ETC may want to reconsider the wording of the policy so that it encourages these practices where possible as opposed to requires in all cases, as some of the policy requirements may not be possible for many sites.  It would be useful to know why 20-unit threshold is proposed for requiring SuDS – we understand this might be drawn from some other NP examples? Policy DM 16 in the LPSV sets out at all proposals must seek to manage surface water flood risk, and that all major

No.	Page Number / Policy Number	Comments	Potential Action
			development proposals (10 homes or more) need to include at least one source control SuDS measure.  <a href="#">Suggestions from the Council are yet to be actioned. The comments of July 2018 remain.</a>
22	Action Plan Pages 41-44	St Margaret's Hospital is still listed in the table.	<a href="#">Update to the table should me made to reflect the changes to the main part of the NP.</a>



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Dear Ms Rumsey,

**Subject: Epping Forest District Council's Response to the Draft Epping Town Neighbourhood Plan**

Thank you for inviting the District Council to comment on the Draft Epping Town Neighbourhood Plan which has been published for consultation under regulation 14(c) of The Neighbourhood Planning (General) Regulation 2012.

The Council commends Epping Town Council and the Neighbourhood Planning Advisory Committee on the significant work that has been undertaken in preparing this considered and positive Plan for consultation. To date, the District Council and Epping Town Council have engaged positively, and the Council are keen to maintain a positive and constructive approach to engagement in the finalisation of the Plan, alongside the Strategic Masterplan for South Epping, and the Local Plan.

As you will be aware, Neighbourhood Plans must meet a number of 'basic conditions' set out in Schedule 4B of the Town and Country Planning Act 1990, and Neighbourhood Plans must also have regard to national planning policy as well as be in general conformity with the strategic policies of the District Council's Local Plan. Officers in the Council's Policy Planning Team have reviewed the Draft Epping Town Neighbourhood Plan in light of national planning policy and the District's Local Plan Submission Version 2017 (LPSV), and we have sought to set out constructive suggestions and comments as far as possible. The main points are

covered in the body of this letter, and more detailed comments are included in the accompanying table.

### **Strategic Environmental Assessment (SEA)**

In order for a neighbourhood plan to meet the basic conditions at examination it must be compatible with EU obligations. One of these obligations relates to the effect a plan may have on the environment. Epping Town Council must therefore consider whether Strategic Environmental Assessment (SEA) will be required to inform and support the Neighbourhood Plan (NP). Planning Practice Guidance<sup>1</sup> states that:

*where a neighbourhood plan is likely to have significant environmental effects, it may require a strategic environmental assessment. Draft neighbourhood plan proposals should be assessed to determine whether the plan is likely to have significant environmental effects. This process is commonly referred to as a “screening” assessment and the requirements are set out in regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004.*

Primarily because the NP is proposing site allocations, and these site allocations are within proximity to Epping Forest SAC (see below for further detail), it is highly likely that an initial screening assessment will identify the potential for significant environmental effects, and that an SEA will be required. Undertaking an SEA involves a number of stages, with responsibilities lying with both the District Council and with the Neighbourhood Planning group. Should you require any further advice on the requirements for screening, scoping and preparation of an SEA report then we would be happy to assist. Please note that consultation with statutory bodies will be required during the screening and scoping stages, and on the final report accompanying the Submission Version of the NP.

It is important to note that SEA should not be done in isolation from the work to prepare the NP, but rather the emerging findings of the SEA should feed into the NP as it evolves, ensuring that the NP responds to any environmental problems that arise.

### **Epping Forest Special Area of Conservation (SAC), Site Allocations and requirement to undertake Habitats Regulations Assessment (HRA)**

The Council has a duty as the ‘competent authority’ under the Habitats Regulations to protect the Epping Forest Special Area of Conservation (SAC) which is internationally protected from the effects of development (both individually and cumulatively). From work undertaken to date, two specific issues have been identified that could have a likely significant effect on Epping Forest SAC. These being:

1. The result of increased visitors to the Forest arising from new development.
2. The result of damage to the health of the flora, including trees and potentially the heathland habitats, from air pollution generated by vehicles.

Because the Neighbourhood Plan is proposing to make site allocations, and these sites are located within the Zones of Influence for recreational impacts (currently understood to be 6.2km from the edge of the SAC based on the recently completed Visitors’ Survey<sup>2</sup> ) and air quality impacts on the Epping Forest SAC (currently understood to be the entire District), the

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<sup>1</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#strategic-environmental-assessment-requirements-for-neighbourhood-plans>

<sup>2</sup> <http://www.efdclocalplan.org/wp-content/uploads/2018/07/EB613-Epping-Forest-Visitor-Survey-Report.pdf>

NP will need to demonstrate through Habitats Regulations Assessment (HRA) that the development set out in the NP does not result in significant detrimental effects on the Epping Forest SAC. This is particularly complicated and difficult to achieve at the current time whilst the Council seeks to finalise the Local Plan for the District for the reasons explained further below.

To support the Epping Forest District Local Plan, Natural England are working in partnership with the District Council, the Conservators of Epping Forest and other affected local planning authorities to agree a Mitigation Strategy for the Epping Forest SAC. This Mitigation Strategy will identify how the impacts arising from the proposed growth in the Local Plan can be mitigated, and to seek contributions from development to implement this strategy. This strategy is not yet complete, but an interim strategy is expected to be agreed before the end of 2018.

Natural England (NE) has advised that in the absence of an adopted Mitigation Strategy for Epping Forest SAC, Neighbourhood Plans should await the adoption of the Local Plan (see advice given to Chigwell as cited below) since at that point, the relevant Mitigation Strategy and District-wide HRA will have been thoroughly tested through the Local Plan examination process. We understand that Epping Town Council are intending the Epping NP to be 'made' after adoption of the Local Plan – this approach is supported by the Council. However, if it is the intention to advance with its NP ahead of the Local Plan, the Town Council will need to consider either removing its proposed site allocations from the NP or including bespoke measures to deal with the impacts of the allocations on the SAC, and these measures will need to be supported by the Council, Natural England and the Conservators of Epping Forest.

We note that the proposed allocations in the NP differ from those in the LPSV, including three additional sites. A key issue for the NP will be ensuring that any District-level HRA and Mitigation Strategy can adequately deal with any impacts arising from these additional sites – it may be that additional HRA will be required through the NP process. Alternatively, you may wish to consider removing these additional allocations from the NP. The Council will keep you updated as to the progress on the Mitigation Strategy for Epping Forest SAC and further guidance from Natural England and the Conservators of Epping Forest. We would therefore advise that Epping Town Council wait for completion of the Mitigation Strategy before submission of the final NP.

For further information, you may wish to view Natural England's recent response to the consultation on the Chigwell Neighbourhood Plan Habitat Regulations Assessment, which can be accessed at: <http://www.efdclocalplan.org/wp-content/uploads/2018/05/Chigwell-NP-Natural-England-initial-comments-April-2018.pdf>

Given the likely requirements to undertake both Strategic Environmental Assessment and Habitats Regulations Assessment, and that a common issue for both these processes will be the potential impact on Epping Forest SAC, it may be appropriate for these processes to be combined in an integrated SEA/HRA which has been done for a number of other Neighbourhood Plans across the country.

### **Draft policies restricting development**

The Council recognises the importance that the NP puts on plan-led growth whilst limiting additional growth over and above that which is 'planned for', however as currently drafted Policies 1, 2 and 4 are unlikely to be considered consistent with national or local plan policies. Development Plans should plan positively for growth and should support

sustainable development. The wording of these policies may need to be amended. We provide more detailed comments and some suggestions in the attached table.

### **Local Green Spaces and Wildlife Green Corridors**

The Council notes the aspirations to protect the green spaces of Epping in Policy 2, by designating them as Local Green Spaces, as well as identifying Wildlife Green Corridors. However we would suggest that further detailed justification and evidence for this policy is required. For Local Green Spaces, this could be in the form of a supporting document – rather like a ‘Background Paper’ - which sets out the case for local green space designations, includes robust and compelling evidence, and potentially a ‘checklist’ type exercise against the requirements set out in national policy and guidance. This need not be an excessively onerous exercise, and we can provide guidance if that would be helpful.

With regard to the Wildlife Green Corridors, it is suggested that you engage with the Country Care Team at EFDC and/or Essex Wildlife Trust to see what evidence currently exists with respect to biodiversity and habitats around Epping, to help define the wildlife corridors and the wording of the policy.

### **South Epping Masterplan Area**

The Council welcomes Policy 5 which sets out proposed details regarding South Epping. This generally aligns with the policies in the District’s Local Plan, and we look forward to continued discussion through engagement with the South Epping Strategic Masterplan group. We welcome the detail provided in the supporting text on new proposed highways and junction improvements as well as the proposed wildlife green corridor that will be required as part of the development. This provides valuable locally specific detail that can be used to inform the masterplan, development proposals and seek contributions from developers where appropriate. Further work will be required through the masterplanning process and through engagement with Essex County Council Highways and other stakeholders to make sure that these requirements are justified, evidenced and deliverable.

### **Structure of the Epping Town Neighbourhood Plan**

Through the course of reviewing the draft NP for consultation, it is at times unclear what status the aspirations and requirements set out in the plan are intended to have. Sometimes these are included in the policy boxes as a specific requirement, sometimes they are in a ‘community aspirations box’ and sometimes they are in the supporting text of the plan. Occasionally the requirements are duplicated - an example of this is specific highways and junction improvements – they appear in Policy 3, para 5.9, para 6.7 to 6.8 of the supporting text, and in the Community Aspirations box on page 19. For greater clarity for users of the Plan, the following comments may be useful for improving the structure of the plan:

- firm policy requirements relating to development proposals and land use planning decision-making should be included in the policy box itself, where there is robust and convincing evidence. This gives these requirements the highest status.
- The supporting text should be used to provide the justification for the requirements in the policy, and provide more detail about how the requirements should be applied to planning decisions, or whether further engagement / evidence work is needed.
- The ‘Community Aspirations’ boxes are very useful for including NP aspirations which are not strictly related to development proposals or land use planning within the remit of the NP. We note that you state this in the introduction, however the

community aspirations box on page 19 actually includes suggested highways and junction improvements related to development proposals in the town - these could reasonably be included as policy requirements, where there is sufficient evidence to support them

## Other Comments

In addition to the comments set out above and in the accompanying table, we provide here some further comments on the draft NP:

- Regulation 15 of the Neighbourhood Plan Regulations (2012) require that you submit a map or statement which identifies the designated area to which the proposed neighbourhood development plan relates. We would strongly recommend that you include the map which shows the boundary of the Neighbourhood Planning Area which was designated in 2014, so that it is clear to users / applicants exactly where the Neighbourhood Plan and its policies have jurisdiction. At present, it isn't clear from the Key Diagram what the boundary of the Neighbourhood Planning Area is, and whether some of the proposed designations e.g. green wildlife corridors extend outside of the Neighbourhood Planning Area.
- We would suggest a consistent approach to the titles of policies – some of them currently just have numbers with no titles.
- NPs should generally avoid the inclusion of policies that simply repeat NPPF or local plan policies. Some of the policies in the NP do not appear to materially add anything that isn't already covered in the district wide policies in the LPSV. An example is the part of policy 16 regarding with basement development which is dealt with by policy DM 12 in the LPSV. In these instances, it would be advisable to remove this policy unless it can be amended to provide add value / local detail to the policy in the LPSV, where there are specific reasons to do so.
- The action plan in chapter 13 is a useful way of setting out how the objectives of the NP will be delivered and who will be involved.
- We understand the character appraisals listed in Annex C are now largely complete. These are a very useful source of evidence to inform the interpretation of the NP and Local Plan design policies, and should be made available to the public and to applicants. Those covering the area around South Epping will be very informative for the masterplanning work that is about to commence and in informing future development proposals.

## Conclusion

The Council hopes that the comments provided in this response are helpful, and are received in the positive and constructive way in which they are intended. We look forward to working with Epping Town Council and the Neighbourhood Planning Advisory Committee on the Neighbourhood Plan as it nears completion, and in the forthcoming masterplanning work for the South Epping Masterplan Area. We also look forward to receiving your analysis of responses to the consultation in so far as they relate to South Epping as they will provide a useful input to the masterplanning process.

The Council reserves its right to comment on any forthcoming Submission Version of the Neighbourhood Plan in due course, as well as come to a view as to whether the neighbourhood plan meets the basic conditions after the independent examination has taken

place, after the examiner's report is received and once any modifications recommended by the examiner have been addressed by the Town Council.

We would be happy to discuss any of the above, should you find that helpful.

Yours sincerely

Alison Blom-Cooper  
Interim Assistant Director  
Planning Policy



Detailed comments on Draft Epping Town Neighbourhood Plan – July 2018

No.	Page Number / Policy Number	Comments	Potential Action
1	2. The Big Picture Pages 6-8	<p>The Council welcomes the reference to the District Council's Local Plan to contextualise the Neighbourhood Plan.</p> <p>Paragraph 2.9 incorrectly states that further work is being carried out to identify employment allocations – this took place during the preparation of the LPSV.</p>	<p>The Council advises that ETC only refer to the LPSV as this is the most up-to-date version of the Plan and has superseded the Draft Local Plan 2016.</p> <p>ETC can update Paragraph 2.9 to state that employment allocations are included in the LPSV.</p>
2	3. Vision and Aims Pages 9-10	<p>The Council welcomes ETC's vision for Epping.</p>	<p>None.</p>
3	4. The Forest, Green Belt and Natural Environment <b>Policy 1: Protection of the Forest and the Green Belt</b> Pages 11-12	<p>The wording of the policy implies that the Neighbourhood Plan is making alterations to the Green Belt Boundary. NPs are not currently able to make changes to the Green Belt, only Local Plans, however the proposed revisions to the NPPF include provisions for Neighbourhood Plans to make alterations to the Green Belt (due to be published this month).</p> <p>The map showing the Green Belt boundary for Epping accords with the proposed Green Belt boundary alterations included in the LPSV for Epping, therefore it may be beneficial to clarify that the NP is / is not proposing GB boundary alterations but rather reflecting those in the Local Plan once adopted.</p> <p>The wording is interpreted to mean that no further development within the Green Belt is permitted. The policy requirement for no future development within the Green Belt is negatively worded and not in general conformity with national policy for sustainable development and Green Belt, or the approach of the Local Plan. Development Plans do not have the power to stop all development in the Green Belt.</p> <p>It is not clear what is meant by "in exchange for land required for access improvements". Does this mean transferring of ownership of the land to the City of London Corporation, or the right to use the land? We have some concerns about the deliverability of this part of the policy, as we understand this has not been discussed with the Conservators of Epping Forest.</p>	<p>The Council advises that ETC clarify whether or not it is proposing Green Belt boundary alterations in the NP, or whether it is reflecting the alterations set out in the Local plan (once adopted).</p> <p>The Council advises that this part of the policy prohibiting development in the Green Belt is reworded to afford appropriate protection to the Green Belt in line with the NPPF and the relevant policies in the LPSV, being mindful that national policy does allow for some types of development in the Green Belt for instance agricultural use, development on brownfield land, through permitted development rights and where there are 'very special circumstances'.</p> <p>The Council has not agreed the exchange of Forest land with the Conservators. We recommend that further engagement / negotiation is had before including this in the NP.</p> <p>The Council advises the ETC looks at the Council's Open Space Study at the recommendations for Epping as this may provide useful evidence to help implement the footpath improvements proposed in this policy.</p> <p>The Council notes that it is important to be mindful of the work being done at a District level on protecting the SAC and mitigating the recreational impact on the Forest.</p>
4	4. The Forest, Green Belt and Natural Environment <b>Policy 2: Protect and enhance open space within the Parish</b> Pages 11-12	<p><b>Local Green Spaces:</b> The Council notes the aspirations of ETC to protect the green spaces of Epping by designating them as Local Green Spaces. The policy tests (NPPF para 77) and Government advice for designating LGS includes:</p> <ul style="list-style-type: none"> <li>• That the area of land should not be extensive, and must be local in character</li> <li>• It should be demonstrably special – for most open spaces it will not be appropriate to designate them as LGS</li> <li>• It should be supported by robust and compelling evidence</li> <li>• It should be carefully considered whether LGS designation is required in order to protect the site from development. The site may already be protected by virtue of another designation in a Local Plan or other planning designation, e.g. Local Wildlife Site, Green Belt etc.</li> </ul> <p>Currently it is not clear what the evidence is to designate the proposed LGS in relation to the above points, and we are concerned that some of the areas, such as at Stonards Hill, could be considered 'extensive' in area. Additionally, Swaine's Lane is designated as a Local Wildlife Site and is Metropolitan Green Belt.</p>	<p>Further detailed justification and evidence for the Local Green Space designations is needed. This could be in the form of a supporting document – rather like a 'Background Paper' which sets out the case for LGS designations, includes robust and compelling evidence, and potentially a 'checklist' type exercise against the requirements set out in national policy and guidance. This need not be an excessively onerous exercise, and we can guidance if that be helpful.</p> <p>The Council advises the ETC looks at the District Open Space Study (2017). This is the main evidence the Council has on open spaces across the District and has informed the LPSV. It includes an appraisal of the various open spaces and a series of recommendations for Epping. This may provide useful evidence for this policy. <a href="http://www.efdclocalplan.org/wp-content/uploads/2018/02/EB703-Open-Space-Strategy-4-Global-2017.pdf">http://www.efdclocalplan.org/wp-content/uploads/2018/02/EB703-Open-Space-Strategy-4-Global-2017.pdf</a></p> <p>Government advice on designating LGS can be found here: <a href="https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space#Local-Green-Space-designation">https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space#Local-Green-Space-designation</a></p>

No.	Page Number / Policy Number	Comments	Potential Action
		<p><b>Wildlife Green Corridors:</b> The Council recognises and supports the aspirations of this policy with regards to wildlife green corridors. This aligns with Policy SP 7 in the LPSV which states that the Council aims to create a comprehensive network of green and blue corridors.</p> <p>We have some concerns, however, as to whether there is sufficient evidence to support the location and extent of the green corridors as they have been identified, and the deliverability of the policy as the corridors cover areas of land that are primarily in private ownership and in agricultural use where new development is not proposed.</p> <p>As above, the policy requirement stating that ‘no change will be permitted other than in very special circumstances’ is not in general conformity with national policy or the LPSV, and is not consistent with the objectives of delivering sustainable development.</p> <p>It is slightly unclear what relationship the different open space, priority area, wildlife corridor designations have to each other, and whether there is a hierarchy – i.e. are some designations more important / afforded more protection than others? Some are identified on the key diagram map, and others not.</p>	<p>It is entirely appropriate, and is supported, for a Neighbourhood Plan to set out how policies in a District ‘Local Plan’ are to be articulated and interpreted at the scale of a town or village, therefore we would suggest linking the identification of these corridors to the Local Plan policy SP 7 – where there is good evidence, there is value in identifying these in the NP in order to assist in the determination of planning applications and negotiation of planning contributions.</p> <p>The identification of the location of a ‘green corridor’ through the South Epping Masterplan Area is in principle supported. Clearly, we will need to work closely with you and the site promoters to understand how this should be accommodated within the strategic masterplan, and further understanding the rationale and justification for the corridor.</p> <p>The Council would suggest that you engage with the CountryCare Team at EFDC and/or Essex Wildlife Trust to see what evidence currently exists with respect to biodiversity and habitats around Epping, to help define the wildlife corridors and the wording of the policy. Note that the Conservators of Epping Forest, in their response to the District’s LPSV, state that a protected green infrastructure corridor is required around the west of Epping, with connections to the River Roding to the south-east.</p> <p>We would suggest that further clarity is provided as to the aims of the policy, and how it will function / be delivered. If the focus is on prohibiting development within these areas, you may wish to consider whether this policy protection is indeed required, as the land is already designated as Green Belt. If it is more about enhancing biodiversity / habitat or accessibility, it may be useful to set this out clearly.</p>
5	5. Epping’s Growth and Development <b>Policy 3: Development Proposals</b> Pages 13-16	<p>The proposed allocations are largely consistent with those in the LPSV, and as such the Council supports the NP’s approach to site allocations in general terms, with the exception of the points set out below.</p> <p>The Council notes the following regarding sites which were considered by EFDC in preparing the LPSV:</p> <ul style="list-style-type: none"> <li>• Epping Sanitary Steam and Laundry Bower Vale (EPP.R9) is allocated in the LPSV for housing and in NP as a mix of homes and public car park. We are concerned about the deliverability of the car parking element. See also our response to Policy 7 on parking provision.</li> <li>• The Civic Offices site (EPP.R8) is allocated in the LPSV for housing and in the NP as a hotel with potential community facilities and relocation of library. We are concerned about the deliverability of the allocation, and whether any engagement has been had with the EFDC as landowner. We are also concerned about the NP proposal to allocate this site without residential development, as this is a key brownfield allocation in the LPSV to deliver 44 homes.</li> <li>• Epping Sports Centre (EPP.R5) is allocated in the LPSV. The NP allocates the site stating that development can come forward “only after a new sport/leisure centre is built within Epping”. We are concerned about the deliverability of this policy requirement. EFDC (as leisure services provider) is considering how it will provide leisure services across the District in the future, and this may mean that a replacement leisure facility could be delivered nearby but not in Epping town itself.</li> <li>• St Margaret’s Hospital was not selected for allocation in the LPSV as the Council’s evidence indicated that the site may not be available in the plan period due to uncertainties about the existing hospital use ceasing. Should the deliverability and availability of the site be secured, the Council would support the principle of the site allocation for housing.</li> <li>• Epping Underground Station and car park (EPP.R3) is allocated in the LPSV for housing led development. We have some concerns regarding the</li> </ul>	<p>Further discussion with ETC is suggested to discuss the site allocations in the NP. A NP cannot ‘undo’ the allocations set out in the District’s Local Plan. It can however add further clarity or propose additional allocations where this is in general conformity with the strategic policies in the Local Plan. Therefore, wherever possible, the Council and ETC should work together to align the allocations in the Local Plan and the NP, and ETC should write to the EFDC setting out what changes it would like to be made to the allocations in the LPSV for Epping, which then may be considered as part of the examination of the Local Plan. This is particularly relevant for sites which are being proposed for allocation in the NP that would impact the deliverability of the site as a whole, or result in a reduction in site capacity, and is also relevant given the Epping Forest SAC issue set out below.</p> <p>Please note that for a NP making housing allocations, Habitats Regulation Assessment and a screening for SEA will be required. It is likely that an initial screening assessment will identify the potential for significant environmental effects and an SEA will be required in these areas in line with the SEA regulations a report must be published for consultation alongside the draft Plan that assess the likely significant effects of implementing the Plan and reasonable alternatives. The Council is working in partnership with Natural England and the Conservators of Epping Forest to develop a Mitigation Strategy to make sure that development in the District does not result in significant effects on the Epping forest SAC (air quality and recreational pressure). Should the NP come forward after examination and adoption of the Local Plan, then the District-wide HRA and mitigation strategy should provide sufficient evidence to support the allocations in this NP, however where there are different sites allocated (as in the case of this draft NP), these sites may not be covered by the HRA or mitigation strategy, and therefore further HRA may be required. The Council wishes to work proactively with ETC and other partners to resolve this issue.</p> <p>In addition to the assessment criteria at Annex A, the Council would suggest that the ETC publish evidence setting out how the sites were assessed against these criteria including the reasoning and justification for the selection of sites, and the site requirements, in particular where they differ from those in the LPSV. Through the site selection process, the Council has gathered a significant amount of evidence for many sites promoted throughout the District,</p>

No.	Page Number / Policy Number	Comments	Potential Action
		<p>deliverability of the requirement for 'an improved station' which is covered in our response to Policy 6.</p> <p><b>Bell Hotel site</b> – No evidence has been published setting out the relative merits / negatives about this site in planning terms to help inform the proposed allocation. This site is in close proximity to Epping Forest SAC, and proximity to the Bell Common Air Quality Management Area means that the Council may not be able to support this allocation – we reserve the right to make further comments on this once responses have been seen from statutory consultees regarding the potential impact of this site.</p> <p>Additionally, this site is located within the Green Belt. It is previously developed (brownfield) land which means that residential development may be supported, however the text in the allocation policy should reflect the current provision in the NPPF for development in the GB - that the design of any development on the site must not have greater impact on the openness of the Green Belt. Note that the revised NPPF which is expected to be published this month includes a change to allow brownfield land in the Green Belt to be used for residential development that contributes to meeting affordable housing needs, where there is no <b>substantial</b> harm to openness. This proposed change to the NPPF would provide greater flexibility for applicants.</p> <p><b>Former Police Station</b> – As above, no evidence is provided setting out the assessment of the site. However it is a brownfield site in the Town Centre and therefore based on the Spatial Strategy in the LPSV, this allocation would be supported in principle.</p> <p>The Council queries the inclusion of the paragraph on an Affordable Housing SPD and the requirement for affordable housing provision to meet local needs. The Council is not intending to produce an Affordable Housing SPD, as the requirement for affordable housing is set out clearly in policy H 2 of the LPSV, requiring that schemes of 11 or more dwellings must provide at least 40% of the dwellings as affordable homes. The wording of the policy 'pending' implies that a different approach should be employed in Epping, or that Epping has very different affordable housing needs than elsewhere, which we don't believe to be the case.</p>	<p>which may be helpful. See 'Site Selection 2018' here: <a href="http://www.efdclocalplan.org/local-plan/evidence-base/">http://www.efdclocalplan.org/local-plan/evidence-base/</a></p> <p>Note also that the Conservators of Epping Forest have objected to some of the proposed housing allocations in the LPSV, and in particular South of Epping Masterplan Area due to potential traffic generation leading to air quality impacts, and recreation impacts on the Forest and its buffer lands.</p> <p>The Council advises the ETC to publish evidence justifying the allocation of this site, as well as providing clarity on the Green Belt implications for the allocation.</p> <p>The Council advises the ETC to publish evidence justifying the allocation of this site.</p> <p>The Council advises ETC to remove reference to an Affordable Housing SPD, and the following text: "Subject to the outcome of the needs assessment and an assessment of viability, the threshold and/or level of affordable housing to be provided in residential developments in Epping will be amended in line with the identified needs of local people."</p> <p>Policies H 1 Housing Mix and Accommodation Types, H 2 Affordable Housing and H 3 Rural Exceptions in the LPSV all make reference to the need for development proposals to meet the housing needs for the local area in terms tenure type, unit size mix, adaptable homes etc., having regard to local demographics and existing housing stock and the need to support mixed and balanced communities.</p> <p>The policies in the LPSV put the onus on the applicant to provide evidence as to what the need is in the local area, however it is entirely appropriate for a Neighbourhood Planning group such as ETC, through the preparation of a NP, to prepare its own evidence of housing need and viability in the area. If this evidence is referenced in the NP, it can then be used to assess whether applicant's development proposals do meet the local needs of Epping in particular. Should ETC wish to prepare such evidence, we would recommend that they set out in the policy a requirement for applicants to demonstrate that development proposals meet local need, having regard to the Town Council's / Neighbourhood Plan's evidence document [title and date of document] where appropriate.</p>
6	5. Epping's Growth and Development Policy 4 Pages 13-16	At present, we have concerns that policy would not meet the basic conditions as it does not accord with the NPPF presumption in favour of sustainable development – A Neighbourhood Plan cannot include a policy limiting the scale of all future development to a specified number of homes. Within settlement boundaries, national	The Council suggests that ETC amend this policy so that it is positively worded, or reconsider whether this policy is required.

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		and local policy would support sustainable development. Within the Green Belt, development is already highly restricted through national policy Clarity on what this policy is seeking to achieve would be useful.	
7	5. Epping's Growth and Development <b>Policy 5</b> Pages 13-16	<p>The requirements set out in Policy 5 are generally consistent with the LPSV.</p> <p>We welcome the detail provided in the supporting text on new highways and junction improvements as well as the wildlife green corridor that will be required as part of the development. This provides really important locally specific detail that can be used to inform masterplans, development proposals and seek contributions from developers. Further work will be required through the masterplanning process and through engagement with ECC Highways and other stakeholders to make sure these are evidenced and deliverable.</p> <p>We support the principle of early delivery of the infrastructure requirements, however it is unlikely to be feasible for all infrastructure to be delivered before the first homes are delivered on site. The Council's IDP sets out what infrastructure is deemed critical, essential and desirable, and the masterplanning process should also provide a means to securing the phasing of the various highways and infrastructure interventions.</p> <p>It isn't clear what the housing number that is being allocated for South Epping is. Policy 5 states 'in excess of 800 homes' however Annex B states 875+ homes.</p>	The Council welcomes this policy and looks forward to continued discussion through engagement with the South Epping Strategic Masterplan. It would be useful to understand the NP rationale / assessment for suggesting a lower number of homes at South Epping compared with the LPSV, Please also clarify what the number the NP is seeking to allocate the site for.
8	6. Accessibility and Connectivity <b>Policy 6: Enhancing Epping Station</b> Pages 17-24	<p>The Council welcomes the aspiration for significant improvements at Epping Station as part of the development of this site allocation. The wording of the policy ('improved station' and 'station redevelopment') implies that wholesale redevelopment of the station building and platforms is being proposed, which would be difficult to support given that the station building is locally listed, and is also highly dependent on TfL's investment plans.</p> <p>The Council's Infrastructure Delivery Plan identifies some station enhancements at Epping Station included improved bus facilities, charging points and access to the station. Details for this site (EPP.R3) in Appendix 6 of the LPSV set out requirements for a Design Brief to be prepared for the site to deliver improvements to Station approach and the junction and an integrated station forecourt transport interchange with retail at ground floor.</p>	The Council is supportive of the aspirations for the station area and approach set out in this policy and the proposed design brief approach. The principle of enhancements to the station itself is in line with the Infrastructure Delivery Plan and the LPSV. However, it is suggested that changes to the wording of the policy are made to indicate that the loss of the original locally listed station building would not be supported. Early engagement with TfL regarding ETC's aspirations for the station is suggested.
9	6. Accessibility and Connectivity <b>Policy 7: Car Parking Provision</b> Pages 17-24	<p>The LPSV's approach to transport is to encourage sustainable modes of transport wherever possible. Policy T 1 of the LPSV includes provision to reduce the need to travel, increase sustainable transport modes and promote transport choice. Therefore, the Council has some concerns regarding the focus on providing five additional public car parks in the town, as this does not support a move towards more sustainable transport modes.</p> <p>It is not clear whether the provision of additional car parking spaces in the town is required to offset the loss of parking at other sites or as a result of the proposed parking restriction proposed through the town.</p>	<p>The Council advises that ETC review this policy against the sustainable transport approach included in the LPSV. The Council is happy to discuss the approach to parking in the NP with ETC.</p> <p>Following adoption of the Local Plan, the Council is intending to develop car parking standards across the District which will be locally specific to the different parts of the District. We would like to work with ETC to develop standards for this part of the District in due course.</p>
10	6. Accessibility and Connectivity <b>Policy 8: Paths to the Forest</b> Pages 17-24	The Council is supportive of ETC's aspirations to improve pedestrian routes in Epping, however note that the aspirations for creating better access to Epping Forest should be balanced with the need to mitigate recreational impacts on the Forest which is a key concern for the Conservators, as well as Natural England.	The Council advises that ETC engage with the Conservators of Epping Forest and Natural England who are working in partnership to produce a mitigation strategy to address the recreation impacts on the forest, in order to understand how the proposed Greenways align with their proposals. It is suggested that ETC explore opportunities to expand the scope of the Greenways to include access to other open space sites and the wider countryside, not just

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		<p>A key factor in reducing recreational impacts on the forest is by providing new alternative natural green space, and by improving access to existing natural green spaces and the wider countryside – this is particularly important for encouraging dog-walkers to use other natural green spaces rather than the forest. Therefore, we would be able to support this proposal more if the policy is expanded to include additional greenway connections to other open space sites and the wider countryside, for instance more east-west connections, to support the use of alternatives to Epping Forest.</p>	<p>Epping Forest, and particularly look at east-west routes as well as north-south. Are there existing Public Rights of Way that could be enhanced, or new sections of footpath / PROWs that could be created?</p> <p>For clarity we the policy title should be renamed ‘Greenways’, rather than ‘paths to the forest’ in order to be consistent with the wording in the policy itself and the supporting text.</p>
11	<p>7. Epping Town Centre <b>Policy 9 Epping Town Centre</b> Pages 25-28</p>	<p>The primary and secondary frontage shown in the NP mirrors that as shown in the LPSV, as do the requirements for percentages of frontages to stay in primary/secondary.</p>	<p>For clarity, you may wish to combine this policy with Policy 11 as they both deal with Epping Town Centre.</p>
12	<p>7. Epping Town Centre <b>Policy 10 St John’s</b> Pages 25-28</p>	<p>The St John’s Road Design and Development Brief has been endorsed by the Council and therefore presents a material planning consideration. The bulk of the provisions in this policy are in line with the brief, however there was concerns identified in the brief over the provision of a new food store.</p> <p>We support the aspirations of the policy to ensure that development at St John’s respects and enhances the character of the area in terms of scale and height, we are concerned that limiting new development to three storeys is overly restrictive.</p>	<p>The Council would advise ETC to remove the requirement limiting development to three storeys and instead reflect the text on page 30 of the development brief (2012) on height, scale and massing.</p>
13	<p>7. Epping Town Centre <b>Policy 11 Sustaining and Enhancing Epping Town Centre</b> Pages 25-28</p>	<p>This policy is in line with Policy E 2 of the LPSV which supports retail, leisure, entertainments, offices, arts and culture, tourism and other main town centre uses while maintaining vitality.</p>	<p>For clarity, you may wish to combine this policy with Policy 9 as they both deal with Epping Town Centre.</p>
14	<p>7. Epping Town Centre Policy 12 Shopfront Improvements Pages 25-28</p>	<p>This policy is in line with the LPSV Policy DM 14 which also seeks to ensure that shopfronts and associated features are designed to a high standard and contribute to a safe and attractive environment.</p>	<p>None.</p>
15	<p>8. Business and Employment <b>Policy 13</b> Pages 31-33</p>	<p>This policy is in line with the LPSV Policies E1 and E4 on encouraging appropriate employment development within the District and encouraging the visitor economy.</p>	<p>None.</p>
	<p>9. Local Facilities for Arts, Culture and Recreation <b>Policy 14 Enhancing social, sporting, play, cultural and community facilities</b> Pages 32-33</p>	<p>The Council welcomes the reference to the LPSV’s approach in this policy and notes the facilities listed by ETC. We also welcome the principle of creating a combined health-hub at St Margaret’s– this reflects the findings of the Infrastructure Delivery Plan, however there remain uncertainties about health provisions at this site. Engagement with the NHS trust / Clinical Commissioning Group is advised.</p>	<p>None.</p>

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	10. Enhancing the lives of local residents <b>Policy 15</b> Pages 34-35	<p>This policy is generally consistent with LPSV Policy DM 9 on high quality design. We are concerned however that using the wording ‘match the character...’ may be overly restrictive. This may give rise to overly derivative/ unimaginative design that simply mimics features nearby, rather than respond positively to a site’s context and may not support the potential for high quality architecture which is innovative / different in style from surrounding development. At present, we would have concerns that this policy runs counter to the objective of paragraph 60 of the NPPF: ‘planning policies and decisions should not attempt to impose architectural styles or particular tastes, and they should not stifle innovation, originality or initiative...’</p> <p>It is not clear what the ‘Epping Design Guide’ is – is this an existing document? What planning status does this have?</p>	<p>The wording of this policy should be reviewed to make it less restrictive – particularly ‘match the character...’. A possible alternative wording could be ‘development proposals will be supported where they are sympathetic to the design qualities and character of the local area / vicinity of the site.’</p> <p>The NP can have a role to provide a more locally specific interpretation of character and high-quality design as requirement by policy DM 9 in the LPSV. You may wish to expand on Policy 15 and its supporting text to explore in more detail what the constituent elements of the character of Epping in particular are – such as urban structure and grain, height and massing, building types, façade and interface, details and materials and streetscape and landscaping. Linking this to the character appraisals (annex C) as your main source of evidence could help strengthen this policy.</p>
	10. Enhancing the lives of local residents <b>Policy 16</b> Pages 34-35	<p>Parts of the policy are in line with LPSV Policies H 1 and DM 13.</p> <p>The presumption against the conversion of garages to residential dwellings causes concern – The NPPF (paragraph 111) and the LPSV place great importance on the need to make the effective use of land, particularly in this District where undeveloped urban (i.e. non-Green Belt) land is so limited. Garage sites can, and do, provide an important source of land for much needed new housing.</p>	<p>The Council would suggest that the part of the policy protecting garages from redevelopment is removed.</p> <p>The Council would suggest the removal of the part of the policy relating to basements as this is covered by policy DM 12 in the LPSV.</p>
	10. Enhancing the lives of local residents Policy 17 Sustaining and enhancing Coopersale Pages 34-35	<p>The Council is supportive of ETC’s aspiration to promote retail uses in Coopersale.</p>	<p>None.</p>
	11. Heritage, Historic Buildings and Public Realm <b>Policy 18: protecting the Parish’s Heritage Assets</b> Pages 36-38	<p>The LPSV protects heritage assets and encourages sensitive design through Policies DM 7, DM 8 and DM 9. The Council supports ETC’s protection of key buildings of interest and commitment to maintaining and enhancing the heritage offer of Epping.</p> <p>We support the aspiration to review the Conservation Areas in Epping, however this is not strictly a land use policy, therefore may be more appropriate to be moved to the supporting text.</p> <p>It is not clear what the ‘community aspirations’ box on page 38 adds. Much of this could be given more weight if it were moved to policy 18, policy 15 or otherwise moved to the supporting text.</p> <p>It is not clear what the ‘Epping Design Guide’ is – is this an existing document? What planning status does this have? I can’t see any explanation of this in the Plan.</p>	<p>The Council would like to discuss the proposals to review and updated the Conservation Area appraisal management plans for Epping, and the proposed list of Buildings of Townscape Merit to explore whether these could also warrant being added to the Council’s local list.</p>
	12. Sustainability <b>Policy 19</b> Page 39	<p>The Council welcomes ETC’s commitment to environmental sustainability.</p>	<p>The principle of the policy is supported. However, ETC may want to reconsider the wording of the policy so that it encourages these practices where possible as opposed to requires in all cases, as some of the policy requirements may not be possible for many sites.</p> <p>It would be useful to know why 20-unit threshold is proposed for requiring SuDS – we understand this might be drawn from some other NP examples? Policy DM 16 in the LPSV sets out at all proposals must seek to manage surface water flood risk, and that all major development proposals (10 homes or more) need to include at least one source control SuDS measure.</p>