Epping Neighbourhood Plan:

Neighbourhood Plan Engagement / Consultation Statement

to comply with requirement of

Section 15(2), Part 5 of The Neighbourhood Planning (General) Regulations 2012

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1. Summary of Neighbourhood Plan Consultation Process

1.1 This Statement sets out a summary of events and consultations and the ongoing work of the Epping Town Council Advisory Committee since its formation in 2015. The aim of formal and informal consultations and engagement has been to ensure that the Neighbourhood Plan proposals have been community led. The public involvement in the preparation of the Epping Neighbourhood Plan has been a combination of regular inputs and specific consultation stages. The regular input has come from local people, representatives of local organisations and Epping Town Councillors working together in the Neighbourhood Plan Advisory Committee. From the outset the Advisory Committee included representatives from the influential local groups such as the Epping Society. The specific periods of consultation extended from the initial consultation by EFDC when the Neighbourhood Plan was proposed, consultation with residents, businesses and local organisations on issues, and consultation on the emerging shape of the Neighbourhood Plan as it was prepared in draft. Consultation with Statutory consultees under Reg 14 took place in June 2018.

1.2 Stages of the Neighbourhood Plan ran in parallel with the Local Plan which was in the process of preparation by Epping Forest District Council, with its own phases of consultation including the examination in public (2019), Main Modifications Main Consultation (Summer 2021), Local Plan Modifications Consultation (Autumn 2022), before the Inspector's Final Report (Spring 2023). And as with many other aspect of local life, the pandemic and associated lock-downs from March 2020 onwards also interrupted the timetable for the overall process of the Neighbourhood Plan. Further, development proposals for a major development, St John's in central Epping, proposed within both draft Local and Neighbourhood Plans, were brought forward by Qualis and planning permission was granted in October 2021 after extensive local consultation and engagement (see para. 5.10 below).

1.3 Consultation, served by information, engagement and local input provided 'threads' throughout the plan preparation process reflecting people's aspirations for their community, concerns and hopes. Consultation was widely advertised and promoted by ETC through its website, magazine (free monthly delivered to residents and businesses) and social media and notice boards, and repeated through local organisations

to their members. From early in the process, within the mass of details provided by local people, a number of key matters emerged, some were 'stand-alone', some with almost universal support, others less-clear and presenting their own tensions.

- The preservation of the character of the town, High Street and wider community
- Protection for the green areas within the town and the green belt areas around it
- Protecting Epping Forest
- Recognition that housing needs existed in some sectors notably young people, key workers, smaller house-holds, elderly, but housing development would impinge on the green areas within and around the town
- Travel infrastructure and congestion
- The impact of car-based traffic within the town (parking and congestion) on routes through the town (commuters into London) the improvement of some junctions prone to congestion, but awareness to control levels of traffic (modal shift) to reduce congestion and pollution
- The provision of services and facilities to support the Epping community
- The geography and topography, the terrain would limit walking and cycling for elderly residents
- Protecting the town's heritage within the needs for modern developments.

1.4 Regulation 14 consultation on the draft neighbourhood plan took place in 2018, and responses triggered a number of amendments. As noted, this was followed by the pandemic and local plan examination and modification where the key issues affecting Epping were explored further, notably the environmental impact of development. Detailed and helpful responses were received from EFDC in June 2018 and April 2020. In the minds of many people separate consultation on the neighbourhood and local plans during this period would have duplicated a process already examining key issues, duplicating and confusing at the same time. This Consultation Statement supports the Submission Neighbourhood Plan and Sustainability Appraisal in accordance with Regulation 14 of the Neighbourhood Planning (General) regulations 2012. It contains the following:

- a) Details of people and organisations consulted about the proposed Neighbourhood Plan and the various stages
- b) Details of how they were consulted
- c) A summary of the main issues and concerns raised through the consultation process
- d) Descriptions of how these issues and concerns have been considered, addressed and where appropriate altered in the Neighbourhood Plan.

1.5 The Neighbourhood Planning (General) Regulations 2012 (Localism Act 2011) require a Consultation Statement to set out the consultations undertaken for the Neighbourhood Plan. In accordance with these Regulations and the local planning authority's guidance on consultation, the

preparation of the Epping Neighbourhood Plan has involved residents, businesses and other organisations with an interest in the parish in the various preparatory stages of the plan.

1.6 Guidance from Department for Communities and Local Government (10 Sept 2013) states that:

'the consultation statement submitted with the draft Neighbourhood Plan should reveal the quality and effectiveness of the consultation that has informed the Plan proposals.' This Statement sets out details of consultation events and the activities in which the local community and volunteers have been involved. The aim of the consultations in Epping have been to ensure that there is as widespread as possible understanding of the reasons for and content of the Neighbourhood Plan and to generate input to shape the final Plan version.

1.6 Epping Town reflects both its old origins and its life within a thriving community on the outskirts of the London metropolis. The potential for new development within the town centre, notably the St John's / Cottis Lane / Bakers Lane combination attached to the town's traditional market-town High Street, plus more rural hamlets typify the mixed nature of the area. The growth of adjoining areas – Ongar and Harlow, are having an effect on the parish with through traffic congestion from commuting and access to Epping Forest. The Neighbourhood Plan has a number of tasks: maintaining the economic vigour of a bustling market town, enhancing the quality of life for people living within the parish and conserving the heritage and green and open spaces that are a significant part of the parish's character.

1.7 Consultation and engagement has been central to the process of preparing the Neighbourhood Plan. Under the auspices of the Town Council ,an Advisory Committee made up of up to twenty local people, has met regularly. From early 2015 the Advisory Committee has directed and overseen the production of initial data, Household Survey results, local engagement and an up-to-the minute appraisal of local topics and statistics around the emerging Plan themes, and consultation on a draft Plan. Engagement used a variety of media including

- the Town Council's website,
- information, updates and surveys distributed to every household and organisation via regular newsletters,
- meetings and discussions around the parish with various interest and age groups,
- an exhibition held at the main community centres in the town,
- stalls / displays at the Market in the town centre.

1.8 Core statistical data was derived from a structured questionnaire to inform the contents of the emerging draft plan, delivered to every household in the parish. Items advertising the plan and the questionnaires were posted in prominent locations in various locations.

1.9 The meetings of the Advisory Committee were open and enabled discussions with specific groups e.g. representatives of landowners, heritage groups, and people from areas most affected by draft proposals. Efforts to involve traditionally hard-to-reach groups included hand-outs to commuters and shoppers, displays in pubs and youth groups, and the involvement of representatives of local groups bringing the issues and questions into their discussions. The process included press-releases to local print, radio, TV, and social media, plus Illustrated notices for display boards in any / every suitable place in Town – shops, churches, etc.

1.10 The consultation responses shaped the outcome of the Neighbourhood Plan, notably challenging the extent of the original new

recreation, leisure, medical, education and administrative, as part of development proposals, a heightened focus on the heritage issues including a proposal to link the two conservation areas, measures to address traffic congestion, reduce overall levels and improve parking arrangements, and to respond to particular housing needs within the area. The responses from Epping Forest District 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.
- A Strategic Environmental Assessment (SEA) will be required *where a neighbourhood plan is likely to have significant environmental effects, notably site* allocations within proximity to Epping Forest SAC (6.2km from edge of SSC)
- the 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) will need to consider :
- 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.
- 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 when measures will have been 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.
- 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.
- 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.
- 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.
- 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.
- 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.
- 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.
- 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.

- 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
- 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.

1.11 Advisory Committee Sub-Groups formed to consider the public's responses and produced reports (see Annexes E-K). Each report shows the issues raised, the volume for each, with a short summary and identifies the main themes impacting changes to the draft Plan. Several overlapped, for instance responses raised concerns regarding over-development affecting the character of the area under the headings for Heritage, Development and Green Belt. The themes impacting the draft plan were:

- To recognise the strong concerns for local people to ensure Epping's character is retained including concerns over current and future levels of development and congestion
- The scale of development proposals for Epping needed reviewing, location and number of new dwellings, location, impact on green belt (and align housing numbers with district plans)
- This process needed to take into account road infrastructure, facilities and the market-town character of the area
- Regarding South Epping to engage with reductions in the numbers of new dwellings
- To seek transport infrastructure improvements ahead of development
- To seek transport infrastructure improvements ahead of development and provision of services in the development to reduce the need for travel to the town centre
- To include facilities and infrastructure within development packages
- The needs of an ageing population (notably health facilities)
- Including starter, affordable and age-appropriate housing
- Recognise the importance to local people of protecting and conserving local green spaces within and round the town
- To seek road capacity improvements without eroding the Forest, including real-time signage to direct road traffic onto the M11
- Drop proposals for redevelopment over the station,
- To maintain options for extending rail travel from Ongar and North Weald into Epping, (possibly linked to a park and ride scheme outside the neighbourhood plan area)
- Policies and proposals which support the town's character/heritage, and the High Street as the main area for shops and services
- Reduce elements in the plan around tourism and a new hotel,
- Review proposals for the St. Johns development
- Review the operation of existing car parks,
- Policies and proposals which support the town's character/heritage,
- Review the option for multi-storey car parks,
- Review the conservation areas proposals to protect appearance and character of Epping, the listed buildings, inclusion of trees

1.12 Paragraphs and tables at 5.6 and 5.8 below show how the consequent alterations addressed in re-drafting the Plan. In addition, the responces from statutory consultees and other bodies lead to major changes to the Neighbourhood Plan including:

• omitting measures to encourage people visiting Epping Forest (see letter from EFDC dated 21st April 2020) and down-playing the potential role for Epping in tourism,

- initially identifying that residential development at Epping Station would involve more dwellings but with a low / nil parking provision due to the proximity to transport infrastructure (Transport for London (Commercial Department) but later removing proposals for residential development at this site completely,
- recognising in the Plan that West Essex CCG is not proposing new GP surgeries at St Margarets or St Johns sites and is working with NHS England to review future health services delivery arrangements and associated infrastructure avoiding commitments to future specific built facilities to deliver health solutions in other ways,
- removing the highway measures which would involve taking Forest land as advised by Essex CC Highways which did not support the
 proposed highways measures (although these had been shown as community aspirations not policies). The transport interventions
 being pursued (by ECC) was to address network issues from north of Epping through to the M25 to mitigate planned growth rather than
 to deal with congestion already experienced which would take land from Epping Forest Special Area of Conservation. Similar
 mitigation measures including real-time signalling had already been under consideration within the neighbourhood plan.
- Further ECC Highways considered policies and proposals should focus on reducing the need to travel, and prioritising sustainable travel and this was included in policy 7 despite opposition from local people. In detailed comments, ECC Highways did not oppose on balance an extra lane at Bell Common traffic lights, and noted that no bypass option is available through currently proposed growth plans for Epping – the neighbourhood plan does not include a by-pass although this had some public support. Infrastructure to support South Epping (and measures re Brook Road / Bridge Hill) would need to be clarified depending on the levels of development, and that provision of 'improved traveller information tools' might be useful in the local context. The Highway authority felt that car-parking charges are a demand management tool but the 600+ additional public car parking spaces in Epping will draw in more car traffic, exacerbating the congestion problems,
- The developers of South Epping have suggested that in addition to access roads a non-vehicular connection across the site and across the railway would encourage more sustainable transport patterns, and this change was built into the re-drafting.
- ECC had considered potential for a Park and Ride facility at North Weald to serve Epping station, and the neighbourhood plan includes provision to protect the rail line from Epping to North Weald,
- TfL suggested extending some of the Mayor of London's Transport Strategy policy objectives to Epping promotion of Healthy Streets, rebalancing the transport system towards walking, cycling and public transport, improving air quality and reducing road danger, and the Plan re-draft includes zero-parking on developments close to the station,
- Development of the sites at Steam Laundry and EFDC offices for non-employment uses conflicts with promotion of employment and have been dropped from the re-draft..

1.13 Epping Town Council made appropriate representations to the Local Plan Examination on several aspects, and attended several days of the Public Hearing. The Epping Neighbourhood Plan is in conformity with the adopted Local Plan 2011-33 and its policies - EFDC has confirmed that neither an SEA nor an HRA is required. If approved by the District Council, the Neighbourhood Plan will then be subject to an independent Examination with any recommendations for alterations made by the Examiner will be incorporated before the plan goes forward to a local referendum. If supported by a majority vote at the referendum, the Neighbourhood Plan will be adopted as planning policy for the Town.

1.14 Both the regulation 14 consultation (2017/18) and other related community engagement and consultation undertaken informed the development of the Plan and its main outcomes. Further details from the consultation in 2018 are given in the annexes – where the Advisory Committee working groups analysed responses on various topics.

2. Timetable

2.1 The table below sets out the timetable for the development of the Neighbourhood Plan and the various elements of consultation and engagement. From its initiation, the Advisory Committee comprising some local councillors, representatives of local organisations and local residents was the principal mechanism for shaping content, reporting progress to the Epping Town Council.

2.2 A variety of consultation media engagement processes were used at different stages, including survey material sent to every household, displays and exhibitions, plus internet / website / social media interfaces. Major elements of the processes included distribution to all households in the parish plus targeted group meetings and face-to-face discussions.

Consultation Stages

July 2014	Epping Town Council applies to the local planning authority (Epping Forest District Council) for Designation of a Neighbourhood Planning Area.		
August to September 2014	Neighbourhood Plan Designation 6 week consultation by Epping Forest District Council	Five responses were received from two parishes: Buckhurst Hill Parish Council and Loughton Parish Council made no comments; the Epping Society supports the designation; and two developers asked to be kept informed of progress.	
6 October 2014	Epping Forest District Council Cabinet approved the Neighbourhood Plan Area Designation application		
18 th March 2015	Epping Town Council form a Neighbourhood Plan Advisory Committee.		
14 th Sept 2015	Epping Town Council launches its early community engagement at Epping Market and the logo for the project – Epping Together, Your Town, Your Say.		
23 September 2015-12 November 2015	Drop in sessions at Epping Hall, Jack Silley Pavilion, Community Market Stall, Epping Library and Starbucks.		
11th February 2016	Epping Together Social Event, Conference Room, Epping Hall. 10am-1pm. Come and see the results of our early engagement work.	50+ attendees	

15th February 2016	Household questionnaire is delivered with Talk About Epping magazine, Spring 2016, to get more detailed information about community views on Epping. Survey Monkey questionnaire launched to coincide with the paper copy.	Distributed to all residents, local organisations and businesses (approx. total 4,000)	
April 2016	Closing date for questionnaire returns.	e 500+ hard copy returns, plus 700+ on-line	
Spring 2018	Formal consultation on draft plan 4,000+copies to households, local organisations, businsesses and statutory consultees. Results of consultation considered by Advisory Committee and reported to Town Council (July 2018) Key matters and alterations incorporated into draft plan,		
2018 / 19	Re-draft of Neighbourhood Plan		
June 2020	Input from EFDC		
2020 / 2022	Covid lockdowns and final stages of EFDC local plan		
	Ongoing local awareness of the process maintained through the ETC website, magazine articles to local people and businesses, references in public meetings and the Council's regular reviews – see para 5.16		

3.0 Initial Consultation 2014

3.1 Following the close of the 6 week consultation period, Epping Forest District Council considered all the comments received and the Cabinet approved (6 October 2014) the Neighbourhood Plan Area. The Consultation ran for a 6 week period, commencing from Monday 11 August to 19 September 2014. This was not a consultation on the Neighbourhood Plan itself, only the identification of the area for which the parish or town council wished to prepare a neighbourhood development plan. The EFDC cabinet report is shown as Annex A.

4. Issues Survey

4.1 Extensive local consultation to support the preparation of this Plan was undertaken to identify topics and issues during September and October 2015 before the Neighbourhood Plan was prepared. From the initial launch at Epping Market and the preparation of design material and a logo for the project – Epping Together, Your Town, Your Say, the process to identify topics and issues included Drop-In sessions at Epping Hall, the Jack Silley Pavilion, a Community Market Stall, in Epping Library and the Starbucks High Street cafe. There followed an Epping Together Social Event, in the Conference Room at Epping Hall where the results of the early engagement work were displayed.

4.2 The Headline results were:

What residents like	Big Issues to address
 Strong sense of community Good transport links to London Surrounding countryside and forest 	 Local parking and through traffic Protection of Green Belt and surrounding countryside Appropriate infrastructure for new housing
Market town character	 Police presence Access to GP and medical services More independent shops Swimming pool

4.3 The household survey was undertaken by paper delivered with Talk About Epping (the local newsletter) from 15th February 2016 to 3rd April 2016. 703 paper surveys were collated (a further 7 were received too late to be included in the analysis. In addition 150 responses were received on-line; the results are summarised below (see also Annexes B and C).

4.4 Key responses from these surveys:

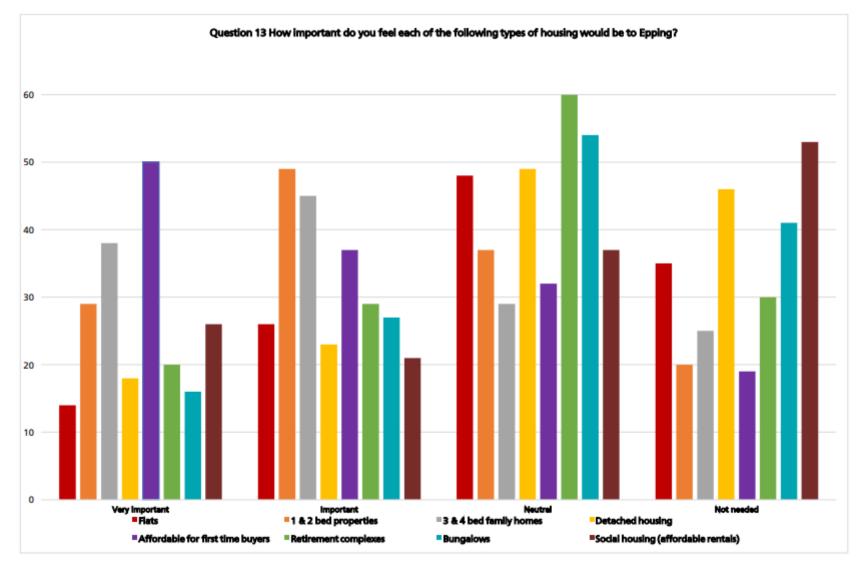
	Important	Neutral	Not important	Not aware of
Allotments	53	46	42	9
Car parks	112	27	11	1
Children's playgrounds	100	31	19	1
Epping Hall	46	76	20	9
GP surgeries	145	4	2	0
Hospital	130	16	3	1
Jack Silley Pavillion	41	80	18	11
Library	109	37	5	0
Place of worship	65	55	28	2
Recreation grounds	130	18	2	0
Sports centre	108	30	10	0

2. How important are the following facilities to you?

7. What other facilities would you like to see in Epping, e.g. cinema, pre-school places, community centre etc?

Cinema	68
Swimming pool	48
Improved sports centre and wider	
sports offer	23
Community centre	20
Parking	11
Health services	10
Arts and Culture space/activities	7
More provision for younger children	7
Supermarkets (Waitrose, Lidl, Aldi)	7
Youth centre / facilities/activities	7
Independent shops and restaurants	6
Pre-school	6
Adult education/classes	4
No cinema	3
OAP engaement / activities	3
Better recycling facilities	2
Folk museum	2
Museum	2
Outdoor gym equipment	2
Playgrounds	2
Town square	2
Better bus services	1
Chain pub	1
Citizens Advice Bureau	1
Cycling lanes	1
Development of green space	1
Essex Records access in library	1

Family activities	1
Fast food restaurant	1
	1
Forest walks	
Function room	1
Keep Epping Hall	1
Larger retail spaces	1
Less charity shops	1
Library	1
	1
Lower business rates	
Meeting facilities for clubs and	1
societies	-
Mini roundabouts	1
More activities	1
More entertainment options	1
More public information	1
No change	1
Pretty school	1
Protection for green areas	1
Real high street	1
Recreation facilities	1
Recreational areas	1
Remove fencing at Stonnards Hil	1
Small business centre	1
Small shopping centre	1
Town parade	1
Transport options	1
Undercover area for events	1



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completed by the person mining in the question mane. House dat an electane boxes.			
	Response Percent	Response Count	
Bus	8.7%	13	
Car	65.1%	97	
Bicycle	8.7%	13	
Motorcycle	2.0%	3	
Scooter	1.3%	2	
Walk	79.9%	119	
*Other (please specify)	·	9	

8. When a member of your household visits the town centre, how do they usually travel? To be completed by the person filling in the questionnaire. Please tick all relevant boxes.

4.3 The results showed considerable concerns over how additional housing development could impact the character of the town which was highly valued, the way in which it would add to the existing considerable problems of through-traffic, commuters arriving to access the tube-line (Epping being the start of the system into the Central Line and the rest of the London underground network, congestion at junctions, and concerns that the more housing would place greater strains on services such as health and education, and facilities, notably leisure and recreation facilities.

4.4 Along with the concerns over additional housing development, the survey showed that people acknowledged the need locally for affordable housing, smaller homes for young and elderly singles or couples, and specialist dwellings for the elderly and bungalows. The protection of Epping Forest and the green belt, as well as the 'green' nature of the town and the area remained a strongly-held view throughout

4.5 In terms of the policy threads:

Threads	Direction of policy development
The preservation of the character of the town, High Street and wider community	Understanding what creates the character and the community identity, and what that might mean in NP policy terms
Protection for the green areas within the town and the green belt areas around it	Although protection of the green belt and Epping Forest seemed an obvious policy area, it would be in conflict with the anticipated housing targets.
	It also brought forward a question about the potential for employment growth, and for instance tourism

Recognition that housing needs existed in some sectors – notably young people, key workers, smaller house-holds, elderly, but housing development would impinge on the green areas within and around the town	Homes and the availability of suitable housing were a concern (see table above) notably around affordability, flats and smaller houses, with little appetite for social housing (character?)
The impact of car-based traffic within the town (parking and congestion) on routes through the town (commuters into London) the improvement of some junctions prone to congestion, but awareness to control levels of traffic (modal shift) to reduce congestion and pollution	This was one of the universally-voiced issues among local people. It was pointed out that Epping station was the terminus for Central Line trains / tube, thereby attracting commuters from a wide area to the north and east, leaving cars parked in the town all day.
The provision of services and facilities to support the Epping community	The table above shows preferences for services and facilities in Epping (rather than travelling to other locations – Harlow, Loughton, etc). Cinema, sports, swimming pool and community facilities figured strongly as local needs.
The geography and topography, the terrain would limit walking and cycling for elderly residents	Modal shifts to walking and cycling as a solution was questioned from early in the process due to the topography and terrain. Descriptions of Epping and its early development highlighted the central ridge of land and the difficulties for those with mobility limitations walking or cycling uphill into the town centre.
Protecting the town's heritage within the needs for modern developments.	This focused on the extent of the three conservation areas within the parish, their nature and the considerable number of listed, and other buildings deemed important by local people, with a strong overlap with the 'character' issues.

5.0 2018 Consultation on a Draft Plan

5.1 The Neighbourhood Plan Advisory Committee prepared a draft plan which was the subject of extensive consultation within the local community. Copies of the consultation document were available in hard format and provided electronically to individuals and organisations (May 2018).

5.2 The draft Plan was prepared in light of the emerging Epping Forest District Plan Local Plan and in response to the matters raised in the 2015/16 consultations. A starting point for the Plan was a 'vision', a high-level statement within which policies would be framed.

Community Groups	Churches	Schools	Statutory / Landowners
1st Theydon Garnon	All Saints Church	Coopersale & Theydon	Statutory
Scouts	Buddhist Centre Duldzin	Garnon Church of	
414 Epping Air Cadets	Dragpa Centre Church of	England Primary School	Brentwood Council
4th Epping Scout Group	The Immaculate	Coopersale Hall School	Broxbourne Borough
Accuro	Conception Catholic	Epping Primary School	Council
Barley Greyhound	Church	Epping St John's School	Chelmsford City Council
Sanctuary	Churches Together in	Ivy Chimneys Primary	City of London
Barnardos	Epping and District	School	Corporation
Cats Protection	Epping Quakers		East Herts District
Cats Protection Harlow,	Methodist & United		Council
Epping Forest & District	Reformed Church St		Enfield Council
Churches Together	John the Baptist Church		Epping Forest District
Coopersale Cricket Club			Council
Coopersale Institute			Essex County Council inc
Countrycare			Planning &
David Watson Tennis			Highways
Dream Factory			Harlow District Council
Epping & Theydon			Hertfordshire County
District Girlguiding			Council
Epping Archers			Harlow Council
Epping Art Society			London Borough of
Epping at the Movies			Havering
Epping Bowls Club			London Borough of
Epping Cricket Club			Redbridge
Epping Business Group &			London Borough of
Anything Epping			Waltham Forest
Epping Detachment,			Uttlesford District
Army Cadets			Council
Epping Eppingen			
Association			
Epping First Responders			Epping Upland Parish
Epping Forest Badger			Council
Group			High Ongar PC
Epping Forest Band			Nazeing Parish Council
Epping Forest District			

Citizens Advice Bureau	North Weald Bassett
Epping Forest Horology	Parish Council Stapleford
Club	Tawney Parish Council
Epping Foresters Cricket	Theydon Bois PC
Club	Theydon Garnon PC
Epping Horizons	Theydon Mount PC
Petanque Club	Waltham Abbey Town
Epping Horticultural	Council
Society	
Epping in Bloom Epping	
Ongar Railway Epping	Anglian Water
Probus Club Epping	Affinity Water
Railway Circle Epping	Thames Water
Reuse	BT
Epping Society	
Epping Squash Club	City of London
Epping Tennis Club	Corporation re Epping
Epping Town Football	
Club	Forest
Epping Women's	
Institute	English Heritage
Epping Youth Football	Environment Agency
Club	Essex Police
Essex Air Ambulance	Highways England
Trust	Historic England
Forest Radio	Historic Buildings and
Friends of Swaines	Monuments Commission
Green	for England (known as
Grant A Smile	English Heritage)
Haven House Children's	Homes and
Hospice Kids Inspire	Communities Agency,
	London Underground
League of Friends of St.	LSCC Growth
Margaret's Hospital	Commission
Friends of Epping Forest	Mono Consultants Ltd.
Lindsey Street	3,
Community Association	Orange,

Mutts in	T-Mobile,
Distress/Second Chance	Vodafone and O2
Neighbourhood Watch	National Grid
Parkinson's UK Harlow &	Natural England
District	Network Rail
Proactive Self Help	Infrastructure Limited;
Prostate Cancer Group	The Environment Agency
Rhys Daniels Trust	Transport for London UK
Rotary Club of Epping	Power Networks Uniper
Royal Air Force	Green Energy
Association North Weald	West Essex Clinical
and Ongar RAFA	Commissioning Group,
Royal British Legion	Primary Care Trust
Epping Branch	
Royal National Lifeboat	Landowners Chisenhale -
Institution RSPCA Essex	Marsh Estate Company
South West Branch	(Carter Jonas) David
St Clare Hospice	Lock Associates
The Box Epping	Iceni Projects
Theydon Bois & District	Pigeon Investment
Rural Preservation	Management Ltd (Carter
Society	Jonas)
Theydon Bois & District	Wates Developments
Friends of Cancer	Limited (Vincent Gorbing
Research UK	
Theydon Trusts Ltd	
Three Valleys Male Voice	
Choir	
Voluntary Action Epping	
(umbrella body for local	
groups)	
WEA (Loughton &	
Epping Branch)	
The responses received are detailed in Annex L	

Threads	Vision
 The preservation of the character of the town, High Street and wider community Protection for the green areas within the town and the green belt areas around it Recognition that housing needs existed in some sectors – notably young people, key workers, smaller house-holds, elderly, but housing development would impinge on the green areas within and around the town The impact of car-based traffic within the town (parking and congestion) on routes through the town (commuters into London) the improvement of some junctions prone to congestion, but awareness to control levels of traffic (modal shift) to reduce congestion and pollution The provision of services and facilities to support the Epping community The geography and topography, the terrain would limit walking and cycling for elderly residents Protecting the town's heritage within the needs for modern developments. 	A community proud of its quality of life, its market-town heritage, proximity to London, and its strong links to Epping Forest, ready to maximise its potential as a destination of historical importance. A community which acknowledges the need for proportionate new housing with increased infrastructure and jobs, facilities, amenities and buildings to support local needs and a town centre which is working, sustainable, varied and vibrant containing a balance of retail, commercial, employment and mixed residential developments respecting the surroundings, attracting residents, visitors and tourists to its varied commercial, arts, recreation and cultural offers. A community which values its location in the Green Belt and the green spaces contributing to the appearance and vitality of the Parish.
	* NB This differs from the vision for Epping set out in the Local Plan.

5.3 It was also considered that the range of non-land-use matters arising from local concerns should be addressed through 'community aspirations' rather than policies, aspirations that conform with the 'vision'.

5.4 The initial process for the Advisory Committee to develop the outline for a neighbourhood plan, was under five key issues:

- the appropriate level and locations of new housing for Epping which respect the green space and Forest setting of the town
- appropriate parking and sustainable transport infrastructure linking area Epping with adjoining areas and London within the constraints and limitations imposed for instance by Epping Forest
- provision of services and facilities to support the community,
- development in the town centre to sustain its commercial vibrancy and vitality, and which supports the growth of heritage-related visitors, and
- appropriate development and design requirement which respect the character of the town

5.5 This work developed into an early draft plan. A questionnaire was designed to obtain the views of residents and organisations on the contents of the draft plan (which was also available) – see Annex D for the full questionnaire (nb the layout allows for the folded final format. The following is an example of how the questionnaire was framed:

Question 2. Growth & Development - new growth is being promoted by government and the District Council. To shape new development over the next 15 years, the Neighbourhood Plan shows sites in and around the town centre with a major expansion at South Epping. Although this means the loss of Green Belt between the town and the M25, this was chosen as meeting the target for housing growth in one location to trigger vital infrastructure. Do you agree with this pattern of new development for the future?

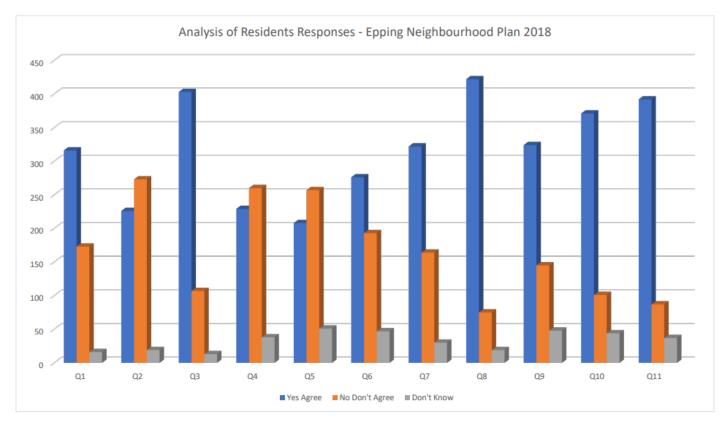
□ YES □ NO (if No please add some comments

5.6 The format of the questionnaire reflected the policies and proposals in the draft Plan – 1. Vision, 2. Growth & Development, 3. Protecting the Forest, Green Belt and open spaces, 4. Facilities, 5. Transport & Parking, 6. Own Centre, 7. Tourism, 8. Employment, 9. Residential Amenity, 10. Heritage, 11. Sustainability. The draft plan had shaped the need for some new housing in the parish, taking into consideration the results and views from the earlier consultation. The questionnaire showed draft proposals with explanations, as follows:

Threads	Questionnaire	
Overall approach / vision	Q.1. Vision	
Protection for the green areas within the town and the green belt areas around it	Q. 2. Protecting the Forest, Green Belt and open spaces - protection for the Forest and the Green Belt, plus three areas to be designated as Local Green Space; and 'wildlife corridors, on the eastern and western sides of Epping.	
	Q.11. Sustainability - proposals for new development to reduce carbon emissions, install electric carcharging points, maximising energy efficiency and incorporating sustainable drainage	
Recognition that housing needs existed in some sectors – notably young people, key workers, smaller house-holds, elderly, but housing development would impinge on the	Q.3. Growth & Development – new sites for growth in and around the town centre with a major expansion at South Epping. Although this means the loss of Green Belt, this was chosen as meeting the target for housing growth in one location to trigger vital infrastructure.	
green areas within and around the town	Q.8. Employment – Because of the layout of the town there is no opportunity for new employment buildings such as on the outskirts of Loughton. Rather than lose more Green Belt or Forest land the employment opportunities will remain limited to the existing offices, hospitality and retail in the town centre, or work in surrounding areas and into London, Harlow or beyond.	

The provision of services and facilities to support the Epping community The geography and topography, the terrain would limit walking and cycling for elderly residents	Q.4. Facilities - the Plan proposes a new sports centre and health hub when the St Margaret's site is redeveloped (after the expansion of the hospital at Harlow), keeping the town centre library and a new town council facility and cinema as part of the St John's development. The South Epping development will include a new school, shops and GP surgery.
The impact of car-based traffic within the town (parking and congestion) on routes through the town (commuters into London) the improvement of some junctions prone to congestion, but awareness to control levels of traffic (modal shift) to reduce congestion and pollution	Q. 5. Transport & Parking – It is difficult to widen roads to relieve traffic pressures without eroding the Forest and degrading the quality of the area. The Plan includes new roads to serve South Epping (including a new railway crossing), major changes to Epping station, five new car parks including a multi-storey to serve the town centre, road junction and traffic management improvements, 20mph limit near schools and retaining options in future to extend the Central Line and a park-and-ride scheme for commuters
The preservation of the character of the town, High Street and wider community	 Q6. Town Centre – the Plan has proposals to protect the main shopping area, new shops and facilities at St John's, a new multi-storey car park at Cottis Lane, the possibility of a hotel and joining the town centre conservation areas. Q.7. Tourism – the Plan is to increase tourism as Epping is surrounded by forest and midway between London and Cambridge. There's good motorways, rail and airport connections, so the Plan includes proposals to attract more visitors and tourists, with a new hotel, improved footpath and cyclepaths from the town centre into the Forest with signs and information about the attractions in the area
Protecting the town's heritage within the needs for modern developments.	Q.9. Residential Amenity – The Plan seeks to shape new developments and maintain a balance of housing types in the area. It contains policies to protect areas of bungalows, to avoid poor design, and to oppose the construction of basements and conversion of garages when it creates overdevelopment of a site. Being close to London means that pressures on new and existing homes could exclude other housing types for older or young people, and more affordable housing
	Q. 10. Heritage – The listed buildings and conservation areas are important in protecting the appearance and character of the parish. The Neighbourhood Plan proposes to link the two town centre conservation areas to ensure that future changes in this area reflect the character of the town centre. Buildings of Townscape Merit will be given additional protection and the Town Council will work with other authorities to improve the public realm in the town centre.

5.7 The table below shows the range of and scale of residents' responses, showing the levels of Agree / Disagree responses, and the Neighbourhood Plan Advisory Committee formed sub-groups based on the Plan's topics in order to analyse the range and details of comments and responses from each part of the questionnaire. The work of the sub-groups is shown in Annexes E - K



5.8 The Sub-groups collated responders' comments, digging below the initial Agree / Disagree scores, the Sub Groups' reports are shown as Annexes E to K. Key points from each of the sub-groups cover the following:

• To recognise the strong concerns for local people to ensure Epping's character is retained including concerns over current and future levels of development and congestion

- The scale of development proposals for Epping needed reviewing, location and number of new dwellings, location, impact on green belt (and align housing numbers with district plans)
- This process needed to take into account road infrastructure, facilities and the market-town character of the area
- Regarding South Epping to engage with reductions in the numbers of new dwellings
- To seek transport infrastructure improvements ahead of development
- To seek transport infrastructure improvements ahead of development and provision of services in the development to reduce the need for travel to the town centre
- To include facilities and infrastructure within development packages
- The needs of an ageing population (notably health facilities)
- Including starter, affordable and age-appropriate housing
- Recognise the importance to local people of protecting and conserving local green spaces within and round the town
- To seek road capacity improvements without eroding the Forest, including real-time signage to direct road traffic onto the M11
- Drop proposals for redevelopment over the station,
- To maintain options for extending rail travel from Ongar and North Weald into Epping, (possibly linked to a park and ride scheme outside the neighbourhood plan area)
- Policies and proposals which support the town's character/heritage, and the High Street as the main area for shops and services
- Reduce elements in the plan around tourism and a new hotel,
- Review proposals for the St. Johns development
- Review the operation of existing car parks,
- Policies and proposals which support the town's character/heritage,
- Review the option for multi-storey car parks,
- Review the conservation areas proposals to protect appearance and character of Epping, the listed buildings, inclusion of trees

	comment analysis and summaries	Draft Plan Alterations
Overall approach / vision	 Vision, Growth & Sustainability Lack of infrastructure Amount of new housing not proportionate / too many homes in Epping compared to other areas Impact on character of market town / Concern about Epping becoming a 	Review wording of Vision and objectives and pursue reductions in new homes numbers to reduce impact on the area, congestion, and strain on facilities.

Drotaction for the groop	 dormitory town / houses for people who won't work in Epping Loss of Green Belt / Protect Green Belt Traffic congestion – especially high street Upgrade existing facilities first Lack of detail about infrastructure proposals Concern about increase in emission 	Overall new house numbers reduced from 1300 to 705
Protection for the green areas within the town and the green belt areas around it	 Green Belt & Open Spaces The policies do not protect green belt completely/sufficiently More green spaces should be preserved Protect open spaces Wildlife corridors Like 8 / Dislike17 	The protection for the Forest and green belt maintained, the reduction in development proposals reduced the impact on both.
Recognition that housing needs existed in some sectors – notably young people, key workers, smaller house-holds, elderly, but housing development would impinge on the green areas within and around the town	 South Epping Need to protect green belt More pressure on roads and tube and facilities, will cause traffic congestion Against any new development / Epping Is full to capacity "Epping South is unworkable due to transport and the proposals to build on car parks and the Sports Centre are incorrect" "The South Epping site is not well related to the town centre in terms of distance and a challenging uphill journey" EMPLOYMENT Epping is largely seen as a commuter town and focus on providing employment is deemed unnecessary. 	Here there was a divergence between the response of key organisations and from local people. EFDC needed to achieve housing growth targets whereas local residents acknowledged the need to provide some housing-types but overall were against growth of the town. The re- drafted plan achieved a lower housing target overall and concentrated the majority in two sites.

The provision of convises and	Facilities
The provision of services and facilities to support the	
Epping community	 Many expressed the view that new or improved facilities needed to be in Again there was a divergence between the
The geography and	
topography, the terrain would	• Respondents were anxious to record
limit walking and cycling for	notice station or an surgeries looking instead
elderly residents	nomes, and a greater supply would need to technology and on-line services instead
	to be provided within the proposed The redrafted plan seeks facilities in support
	quota for new nousing.
	• I he needs of singles, and older couples acknowledged that other changes were
	as well as families must be taken into difficult to counter – e.g. the closure of the
	consideration. This would mean building police station.
	not just luxury flats, but also suitable
	starter properties for singles, and The inclusion of a new sports centre was
	adapted housing for older people. maintained as part of the Plan.
	• Our ageing population gave rise to the
	suggestion that there would need to be
	specific provision of suitable assisted
	living facilities.
	• Support for the retention of St
	Margaret's Hospital was widespread:
	"hospital facilities should be retained in
	Epping". Healthcare must be kept at St
	Margaret's and greater clarification was
	needed as what a Health Hub would
	comprise. In particular it was felt that it
	must cater for the needs of older
	people, and carry out X-rays and blood
	tests.
	• Many people referenced what they saw
	as the poor availability of GP services in
	the town, and expressed fears that this
	would be made even worse by a major
	increase in local population.
	• Any major increase in new homes, and
	therefore more school-age residents

	 would put local schools under undue pressure, so provision needs to be adequate to meet likely need at both junior and secondary level. There was widespread support for keeping a Sports Centre, in particular retaining it within the boundaries of Epping so that it was easily accessible. The need for a swimming pool continues to be mentioned as a priority. There was a lack of enthusiasm for a cinema attaching greater importance to sports facilities. Concerns about the retail mix / more shops supplying basic needs were seen as important; we don't want our high street to consist of nail bars and charity shops. 	
The impact of car-based traffic within the town (parking and congestion) on routes through the town (commuters into London) the improvement of some junctions prone to congestion, but awareness to control levels of traffic (modal shift) to reduce congestion and pollution	 Transport & Parking Parking capacity is an issue with 30 against plans Believe road capacity is an issue or there will be more congestion (and pollution), Major concerns about congestion through Epping, some support for a bypass Against multi-storey (mostly because they are not in keeping with the character of Epping) Want the central line extension, but concerns over high levels of usage and lack of train capacity Must preserve the Market Town character of Epping 	This topic represented one of the most divergent areas where responses differed between local people and organisations, notably the position of the district councils and transport providers to address traffic problems through modal shifts to public transport, cycling and walking. Local people's views included that Epping station as a tube terminus attracted many commuters to drive into Epping from elsewhere and park for the day, with other concerns that the local demography, topography and weather were against walking and cycling as regular solutions to transport, that public transport would not

	 specific issues like Brook Rojunction issues many believe the plans are to make things any better, or make things worse. as the roads are poorly mainew infrastructure won't be Lack on info on where parkican't see how it will work. Some in favour of park and Siting of parking and route issue The concern with building coparks is a result of concern storey car-parks and loss of parking (which needs to be shops). 	insufficient or might ntained now, e maintained. ing will be or ride, to station an on the car about multi- shopper	facilitate all journeys needed for daily needs, and that walking and cycling as an alternative was realistic to alleviate the problems. The re-drafting attempts to balance the broader move in favour of non-car solutions with the short to medium term issues for local people to address parking and congestion problems.
The preservation of the character of the town, High Street and wider community	Town Centre, Tourism & Employr Ranking of issues raised 1. Loss of character/heritage 73 Congestion 74 3. Diversity of Shops 25 30 5. Transport 16 Tourism 27 7. NO to Hotel 45 Multi-storey car park 56 9. Town Centre Dying 40 Shops at St. Johns 16 11. YES to new Supermarket 11 tourism 45 TOURISM: Main Areas of Concern ar	2. 4. Market 6. NO to 8. NO to 10. NO to 12. NO to	The character of the town was a high – priority for local people, and the appearance and vitality of the town centre / high street was a key area. The re-drafting of the plan included the progress for the St Johns re-development and the impact that would have on the town centre's offer and vitality. The references in early drafts to promoting tourism, new hotel, etc was toned down significantly as a result of local responses and the need not to attract visits to the Forest.

	 Epping is not seen as a tourist destination, having no points of interest and an indifferent shopping offering. The Forest, as a tourist destination, is not seen as part of Epping town but rather as a beautiful piece of countryside buffering Epping from Loughton and Harlow, contributing to the semi-rural 'feel' of Epping town. There is a fear that if promotion of the Forest as a tourist destination were to be successful, the Forest would be damaged and eroded, with peace and tranquillity destroyed and the possibility of additional traffic. Tourism, if promoted successfully, would bring yet more traffic and congestion into the town, in addition to the several thousands of people and cars in the new housing developments in Epping and surrounding villages. 	
Protecting the town's heritage within the needs for modern developments.	 Heritage Is the N Plan approach enough to protect the parish's heritage? I really hope so! / hopefully / very much hope this will happen / essential (16 comments) This will help / it's a start / probably / maybe / must be actively enforced (8) Character 	The heritage within Epping is seen as a key part of its heritage. The Plan was re-drafted to reflect this but not to duplicate the Local Plan. Tourism was down-played in the re-draft in light of local opposition. The suggested solutions to the public's
	 Any houses to be developed between & near these sites could be sympathetically designed with faux period features / the new houses to be built should be traditional and in 	from that of the Highway Authority, instead of junction improvements, the long-term aims for walking and cycling were included in policy 7.

	keeping with the market town; ergo	
	expanding Epping, not spoiling Epping /	
	new developments need to be in	
	keeping with the character and	
	attractiveness of the town	
	 Not if you build hundreds of houses / 	
	The heritage of Epping as a small market	
	town will change forever should 950	
	houses be built at South Epping. Listed	
	buildings and conservation areas in	
	South Epping will be lost / town is likely	
	to be ruined by overdevelopment / the	
	visual impact of the development alone	
	is detrimental to the heritage now and	
	for the future.	
	 Heritage will get lost amidst everything 	
	being added / there will be no character	
	left / new development will destroy	
	character of Epping / listed buildings,	
	heritage, and character of the parish are	
	all irrelevant if stuck in the middle of a	
	housing estate / a cinema and multi-	
	storey car park is not in line with	
	Epping's feel and heritage	
T	ourism	
	• Heritage will be a part of the draw in	
	attracting tourism / again quaint has	
	more power for tourism. Tourism brings	
	in money from people who visit, then	
	return to enjoy the area, paying money	
	again and again	
	onservation	
	• Keep Epping as it is now / There should	
	be minimal to no changes in the	
	conservation areas / conservation areas	

	should be extended to protect	
	appearance and character of Epping	
	Heritage is more than just a building /	
	part of the heritage of the area is the	
	countryside (which is being built on!) /	
	our heritage is green and pleasant and	
	spacious, and it's gone / much greater	
	protections should be given to wildlife,	
	open spaces and public footpaths	
•	Heritage is important / vitally important	
	to Epping to retain market town appeal	
•	Concern over loss of historic pubs - 'Half	
	Moon', 'Half Moon' and 'Spotted Dog'	
•	Epping is being flat packed with tall ugly	
	buildings with very little parking	
	provided (Half Moon and Star Lane)	
•	Sensible planning applications are	
	urgently required to stop over build /	
	planners should stop property	
	developers buying up old properties and	
	knocking them down to build flats and	
	retirement homes	
•	any development of the Water Tower	
	and old Gates Garage site will need to	
	be under careful scrutiny.	
Traffic	,	
•	Reducing congestion in the high street	
	would improve the area	
•	new development at St Johns including a	
	cinema could potentially ruin the town	
	centre and cause congestion	
•	Multi storey car parks should not be	
	allowed, they are eye-sores. Likewise,	
	the train station should keep its	
	character and attractiveness, and should	

not be developed into a residential	
development.	

5.9 The range of comments emphasise how, in some people's views, they overlap, notably under the Heritage label, where the impact of tourism, traffic, and other issues were seen as affecting the main topic.

5.10 Issues such as encouraging tourism through new dedicated facilities including a new hotel (which traditionally provides considerable lowskill employment opportunities) received very little support. In addition, the environmental concerns of impact on Epping Forest from additional visitor pressures (which came to the fore through the Local Plan process) meant that tourism and hotel development were dropped as specific proposals.

5.11 It had been noted that Epping lacked significant high-level office or research & development employment opportunities, however proposals for a science park of similar would have meant loss of open space / green belt which local people valued highly. The ability to travel easily to these employment options meant that there was no allocation for these in Epping.

5.12 one of the central issues for Epping was an overlapping complex mix of a) the extent of new housing, b) how to achieve the housing target from the Local Plan, the extent of green space / belt lost, associated infrastructure to minimise additional road traffic and congestion. It was determined that new housing would focus in two locations, the town centre where a number of sites combined to present an integrated development solution, and a site at South Epping – concentrating development proposals offered better chances of developer-funded infrastructure. During the final stages of the NP, permissions for development in the town centre sites were granted - a new leisure centre on the Bakers Lane car park, a new multi-storey car park on the Cottis Lane car park with 330 spaces plus additional commercial and mixed use units, 184 new homes on the St John's Road site including 46 affordable homes, 45 new homes on the site of the vacant Conder Building behind the Council's Civic Offices, and the existing leisure centre site at Hemnall Street will be redeveloped with 40 new homes once the new Bakers Lane leisure centre has been opened.

5.13 The South Epping proposal also changed as a result of the Local Plan process, reducing in scale and extent to minimise environmental impact on Epping Forest.

5.14 There was a clearly articulated wish by local people to protect the green spaces in and around the town. Some green belt land would be given up in order to meet the housing target – at South Epping, but this would be concentrated in one, edge of town location. Other proposals to enhance green space included Local Green Space designations and green corridors / identification of strong hedgerows to enable wildlife to move between disconnected spaces.

5.15 The Plan includes a series of 'Community Aspirations', not land-use policies but proposals which help to address issues raised locally, for instance highways improvements at congestion points, measures to enhance the use of public transport, walking and cycling, and the protection of the route should it ever be proposed to extend the Central Line to other growth areas within the District.

5.16 The covid lockdowns and the delays to the local plan process produced a significant delay for the neighbourhood plan after the consultation responses had been processed and the Plan re-drafted accordingly. In order to keep the wider community was kept informed of how their views were re-shaping the emerging neighbourhood plan, details were included in

- the Town Guide which is a bi-annual magazine delivered to every property and businesses in Epping. Articles included in Town Guide 2019/20, 20/21, 21/22 and 22/23
- Talk About Epping the quarterly parish magazine Autumn 2018, Spring 2019, Spring 2020, Summer 2020, Winter 2021, Spring 2022, Autumn 2022, Autumn 2023,
- Neighbourhood Plan Advisory Committee meetings = open to the public and advertised on the Town Council website 26th July 2018, 20th September 2018, 20th November 2018, 17th January 2019, 7th February 2019, 4th September 2019, 12th August 2021, 23rd September 2021, 25th November 2021, 1st March 2023

5.17 At the time, no-one knew how long the delay would last but efforts were made to keep the local community updated.

6. Conclusions

6.1 The process of consulting local people produced a wide range of responses, all strongly held, some in conflict with others' views. Among those responses were proposals for alternative housing development sites to South Epping, these were assessed against a set of criteria to help understand the pros and cons of each site (the table of criteria is included as an annex to the Neighbourhood Plan).

6.2 At each the consultation responses were incorporated in changes to the issues, aims and policies of the neighbourhood plan through its various stages.

6.3 The passage of time, the covid pandemic, the progress towards an adopted Local Plan for the District, and the approval of development proposals in the town centre, all shaped the contents and the timing for the Neighbourhood Plan, however the end result is a Plan reflecting the needs and aspirations of the community, refined through the various stages of consultation.

Annexes

Annex A: 2014 Cabinet Report	See separate file
Annex B : 2016 Questionnaire Responses Report	See separate file
Annex C: 2016 On-line Questionnaire Responses Report	See separate file
Annex D: 2018 Questionnaire	See separate file
Annex E: Sub-Group analysis of Vision, Growth & Sustainability responses	See separate file
Annex F: Sub-Group analysis of South Epping responses	See separate file
Annex G: Sub-Group analysis of green belt responses	See separate file
Annex H: Sub-Group analysis of Facilities responses	See separate file
Annex I: Sub-Group analysis of Transport & Parking responses	See separate file
Annex J: Sub-Group analysis of Town Centre, Tourism & Employment responses	See separate file
Annex K: Sub-Group analysis of Heritage responses	See separate file
Annex L: Full response table	See below
Annex M: ETC presentation to Local Plan Examination	See separate file
Epping : Emerging Neighbourhood Plan	
Annex N: Comments from EFDC April 2020	See separate file

Annex L

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

Responses and comments are set out below; the key points are summarised as follows:

Vision

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

Growth & Development

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

Protecting the Green Belt & Open Spaces

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

Several respondents have raised issues and concerns over the highways congestion problems in existing parts of Epping adjoining the South Epping proosals will be greatly exacerbated and that new highways infrastructure will not be created to alleviate the problems.

Some respondents refer to the complexities attached to the 'brownfield' sites within the ETNP – Epping Station, St. John's Rd, St Margarets, leisure centre, Cottis Lane & Bakers Lane car parks sites, and that they will not accordingly be capable of delivering new homes over the next few years as required by NPPF.

One respondent argued that the SHMA upon which the EFDC SVLP housing figures are based is flawed and that a higher target will be required. Another felt that on the basis of current modelling data TFL does not believe Central Line capacity should act as a deterrent to planned growth in the Draft Local Plan.

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

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

Responses with Recommendations

Comment / Objection / Changes Put Forward	Source of Comment	
	Reference Number (from Table 4)	Recommendation (Alterations to text / maps highlighted in yellow)
Vision & Aims		
consider all policy proposals against the list of "What residents like" and "Big issues to address" (page 6)	4.Epping Society	Review issues, aims, and objectives to ensure they are compatible
Draft Neighbourhood Plan lacks the required associated documents – Basic Conditions, Habitat Regulations, Environmental Assessment and Consulation Summary, As such the Neighbourhood Plan fails to meet required guidelines ETNP cannot be progressed until Local Plan is submitted and examined. Key strategic issues remain open to scrutiny – the overall Distirct housing requirement, the allocation to Epping and of release the Green Belt. ETNP should at least be held in abeyance whilst strategic issues are resolved;	69, 36 Vincent + Gorbing on behalf of Wates Developments Limited ("Wates")	No changes to text To note, and ETNP will be submitted after Local Plan has been examined and approved Basic Conditions, ESA etc will be prepared with Submission Version
Some ETNP proposals are shown beyond the parish boundaries and should be deleted	55.Iceni on behalf of Tele Lands Improvements Ltd	Review maps to ensure proposals are contained within Epping parish Change Map 1 – add parish boundary
Policy 1: Protection of the Forest and the Green Be	lt	
Environmental Impact The NP area boundary lies within the impact risk zone and includes part of Epping Forest SAC and Site of Special Scientific Interest.	50.Essex County Council	The Neighbourhood Plan will have regard to the assessments and mitigation measures achieved through the EFDC SVLP. No change to text

It is recommended that the Plan makers undertake a SEA Environmental Report prior to the examination of the NP, exploring whether the NP would have any significant effects on the environment. This should cover the assessment of the NP's policies and the NP's site allocations, including all reasonable alternatives.	51.Essex County Council	The submission version of the Neighbourhood Plan will be accompanied by the appropriate SEA, HRA, Basic Conditions, etc. having regard to the allocations made in the District Plan.
Green Belt boundary changes ECC notes that Policy 1 describes the extent of Epping Forest and the Green Belt plus changes to the green belt – and these should be shown on the associated maps which a revised version of this NP needs to address ETNP describes changes to the Green Belt boundary by virtue of the	49.Essex County Council	No change to policy 1 but alter relevant maps Alter Map 1 to show extent of Epping Forest and Green Belt
allocation of the land at South Epping for housing development and its removal from the Green Belt. In contrast, Wates land at Stonards Hill remains within the Green Belt and is designated as Local Open Space In terms of the impact on the Green Belt the evidence base shows clearly that development of the land at Stonards Hill would have less	59.Vincent + Gorbing on behalf of Wates Developments Limited ("Wates").	Review green belt / local open space designations to avoid conflict or confusion Include site assessments as an annex in the Plan
impact on the Green Belt than the South Epping area. Policy 2 Protect and Enhance Open Space		
concerned there could be conflict between the Green Belt designation with others proposed as Local Green Space.	54.Epping Society	Review designations to avoid conflict or confusion
Proposals to build on the Green Belt, whose openness was meant to be assured for all time, shows that public authorities cannot be trusted to comply with agreed designation even within a single generation.		The comments concerning the extent of housing requirement in the parish are addressed below.
Propose that the town green and Stonnards Hill recreation area should be designated a Local Green Space		Review designations for Local Green Spaces
not convinced by the draft NP that the wildlife corridors will achieve their apparent purpose.		Delete designations for 'wildlife corridors' in para 4.3 and Policy 2
		Delete designations for 'wildlife corridors' (as above)

Some ETNP proposals are shown beyond the parish boundaries and should be deleted. This would mean that the remaining Wildlife Corridor running between Bury Lane and Lindsey Street does not provide a connection between strategic or designated wildlife sites and therefore does not function as a wildlife corridor.	56-58.lceni on behalf of Tele Lands Improvements Ltd	
Wates object strongly to the designation of the land at Stonards Hill in Policy 2 and on Map 1 as Local Green Space. It would appear that this proposal is at least in part seen as strategic mitigation for the impact of development at Epping South on the integrity of the Epping Forest SAC. In contrast, as part of a comprehensive scheme with approximately 130 units on 10 acres of land, Wates are proposing to use the majority of	60.Vincent + Gorbing on behalf of Wates Developments Limited ("Wates").	Review open space designations in Policy 2 Add reasons for designation to Policy 2
the site to create a substantial new Country Park of over 20 acres, coinciding with the higher areas of land to the east. The existing trees, hedgerows and woodland areas in this part of the site would be kept and enhanced with new planting, and the grassland areas improved to create species-rich wildflower meadows,		
Local Designated Green Space, which includes the land at Coopersale Cricket Club;	61.Carter Jonas LLP on behalf of Chisenahle- Marsh Estates Company	Review evidence for designation
disagree with the proposed wildlife green corridor on the eastern side of Epping and it is considered that Policy 2 in Draft ETNP does not comply with basic conditions		Add reasons for designation to Policy 2
Local Green Space designation is deleted from the Coopersale Cricket Club site should be deleted – lack of evidence		
<i>"no reduction in the extend and quality of the open space at the Epping Cricket Ground" requires</i> a much higher threshold than applied by either the NPPF or SVLP.	25. Iceni on behalf of Tele Lands Improvements Ltd	Change wording of Policy 2 to deliver protection of open space and compliance with NPPF
No justification or evidence in the ETNP for this contrary to NPPG		

Policy 2 should be reworded to reflect the NPPF and SVLP		
requirements.		
Reject allocation of land as Local Open Space at - Stonards Hill - unsound and undeliverable;	6.Vincent + Gorbing on behalf of Wates Developments Limited	Review evidence for designation
	("Wates")	Add reasons for designation to Policy 2
Paragraph 5.12 (Page 16) This refers to the need to for development to require the inclusion of protection for important trees, hedges, open spaces but this is not specifically referred to in the policy wording.	62.Essex CC	Include wording from 5.12 in policy 3
Section 11 'Enhancing the Parish's Heritage and Public Realm' The need to protect and enhance local landscape features could be reflected in the wording for the community aspiration set out on page 38, ECC advises that the Conservation Areas of Epping Town will afford some protection to trees but it would also be beneficial to refer to the need to encourage the retention and replanting of trees, and other landscape features within the Conservation Area and wider town area.		
It is suggested that references and guidance for the protection and enhancement of landscape features, trees, hedges, and planting could also be reflected within the policy wording for these policies.		Add references and guidance for the protection and enhancement of landscape features, trees, hedges, and planting in policy 18
<u>Policy 9</u> This policy would benefit from a specific title so that it accords better with the remaining document.		Add title to policy
Growth & Development: Policy 3 Development Proposals		
it is not clear to ECC how the stated 1,250 home figure has been arrived at and justified	11, 16-18, 21 Essex County Council	Details of dwelling numbers for each site to be made clearer between policy text and Plan annex – and that housing total matches EFDC SVLP and achieves conformity
should match 1,305		Device to bla 4 to illustrate the tweights are of enought
Revise table 1 to illustrate the trajectory of growth	23.Epping Society	Revise table 1 to illustrate the trajectory of growth

Sites should have densities and numbers The Neighbourhood Plan contains some inconsistent references to the capacity of the South Epping Masterplan Area, particularly between Policy 5 and Annex B. We would suggest that the Neighbourhood Plan should be consistent with the draft Local Plan.	24.David Lock Associates (on behalf of SEMPA)	
Additional / alternative sites should be considered / included as being less damaging to the green belt, South Epping may not deliver required numbers, the sites are more likely to be delivered within an acceptable timeframe, and with the Sports Club(s) will enable up-to-date sporting	6, 34, and 35, 37 .Vincent + Gorbing on behalf of Wates Developments Limited	Not to include the four sites put forward in the Neighbourhood Plan. To note that these sites could be available in future in para 5.14
 facilities to be provided: Stonnards Hill 130 dwellings East Epping – at least 500-600 new homes plus community facilities and green space 	("Wates") 28.Carter Jonas LLP on behalf of	include site assessment tables as annex in revision to Neighbourhood Plan
 Epping Sports Club (with a new sports club to be developed off Bury Lane) Coopersale Cricket ground – 28 dwellings – a new cricket pitch would be provided (not specified) 	Chisenahle-Marsh Estates Company 29 - 31.Epping Bowls Club	There is no evidence to date to suggest South Epping will not provide planned housing numbers within an acceptable timeframe.
would be provided (not specifica)	32.Epping Cricket Club	No basis at present to allocate suggested sites for housing and related development
	33.Epping Tennis Club	The disparity in size means that Stonnards Hill site is not an alternative to South Epping.
	38. Pigeon (representing the East Epping proposal)	Therefore it should be considered as an additional site, but no case for additional sites at present. EFDC SVLP has sufficient sites to meet SHMA. No evidence that any additional housing needs should be met in Epping.
		Challenges to SHMA should be addressed through EFDC SVLP. No evidence at present to suggest housing land supply position at District level will be below or drop below a five year supply necessitating extra development in Epping parish.
Epping is at the top of the settlement hierarchy and is defined as a town centre,		Challenges to SHMA should be addressed through EFDC SVLP. No evidence at present to suggest housing land supply position at

 local housing needs will not be met if the lower housing need figure from the SHMA 2015, should use the 2017 figure 12,573, so the draft ETNP does not comply with Basic Condition Epping Forest District Council will need to update the housing target / additional land should be directed to land within and on the edge of Epping to meet the higher housing target derived from the SHMA 	27.Carter Jonas LLP on behalf of Chisenahle- Marsh Estates Company Owns Coopersale Cricket Club	District level will be below or drop below a five year supply necessitating extra development in Epping parish.
the additional homes proposed for Epping is dis-proportionate support plans to maintain the market town character, with a wider and more ambitious plan to arrest or reverse the change in character of the town, too much of a commuter town, which will be much more pronounced after the addition of a large number of new homes and households (which are bound to be newcomers to our community). the allocation made to Epping in the EFDC LPSV is not proportionate to the size of Epping, and pressure from elsewhere does not amount to the special circumstances demanded by the NPPF.	14.Epping Society 23.Epping Society	The comments challenge direction for future growth set in EFDC SVLP and to reverse 'commuter' pattern The Neighbourhood Plan is unable to address these issues. Challenge to SHMA should be addressed to EFDC SVLP No change to policy.
 Policy 3 there is a strong presumption against further residential development of sites for more than 5 dwellings". This is a significant contradiction to and departure from the requirements of the NPPF and SVLP Policy 4 should be reworded as follows: "The Parish Council will take a positive approach to the consideration of development proposals, reflecting the presumption in favour of sustainable development contained in the National Planning Policy Framework." 	26.Iceni on behalf of Tele Lands Improvements Ltd	Review wording of Policy 3 to deliver protection of open space and compliance with NPPF No evidence at present to suggest housing land supply position at District level will be below or drop below a five year supply necessitating extra development in Epping parish.
Policy 4 By restricting the policy against further residential development of sites for more than 5 dwellings, (lacking any justification for this figure) there is a risk that small-scale growth with an impact on infrastructure would be unable to deliver developer contributions.	19.Essex County Council	Review this aspect of policy 4

Policy 5: South Epping - , it is suggested that the Town Council works with EFDC on facilitating S106 agreements which allow for review points to capture this value uplift. Although EFDC will be responsible for dealing with planning applications and a party to S106 agreements (instead of the Town Council as a rule), consideration could be given to the use of such a value uplift capture mechanism for other developments identified through the NP	20.Essex County Council	Review policy to seek appropriate s .106 provisions
South Epping: nearby residents are vigorously opposed, and we share concerns that Brook Road might be overcrowded by traffic as a result of development and flooding might increase. We do not support development of the green belt.	23.Epping Society	No change to policy There are no practical alternatives to development in the green belt to achieve the numbers required. The proposal for South Epping contains road infrastructure measures.
Policy 5: Should be re-written, to state clearly that no development should proceed until funded, timetabled infrastructure capacity has been agreed. Numbers : "in excess of 800 homes" and "875+" should be reconciled.	23.Epping Society	Alter wording of policy 5 so housing numbers match EFDC Local Plan
Policy 6: <u>Epping Station development</u> the proposed capacity of 89 homes is conservative and should be revised upwards, and at the very least represents the absolute minimum amount of homes that the site should be expected to bring forward.	41. Transport for London Commercial Developments	Alter wording of policy 6 and Annex B to show 89 proposed residential development within Epping Station scheme as a minimum
Improvements to access and surrounding connectivity will be provided as part of any development at Epping Station. Any development of Epping station would retain a proportion of the current car parking spaces for commuter use. It is expected that any new residential development at Epping Underground Station and car park would have limited car parking available for future residents the neighbourhood plan should commit to explore car free residential development at Epping Underground Station, provided that it is demonstrated that there would be no harmful impact on street parking or other services that could not be mitigated.		Review wording in policy 3 and Section 6 re. car-free developments in town centre

ECC would not support extra parking at Epping Station which would encourage commuting and_would not encourage sustainable travel to the station, and is not in line with EFDC LPSV		Include wording in section 6 re possibility of park & ride proposals.
ECC is considering potential for a Park and Ride facility at North Weald to serve Epping station.	42. Essex CC	
EOR is committed to developing and maintaining a rail-to-rail link with the Underground at Epping, development should include an interchange	44.Epping Ongar Railway	Include interchange in policy 6 re Epping Station redevelopment
Low density areas should have greater density to reduce the impact of the target housing numbers on the Green Belt. We do not accept that there is a proven housing "need" anywhere near current plans and are not persuaded that a significant number of additional homes is needed to accommodate our own population,	23.Epping Society	No change to policy Not clear which areas are proposed for demolition and redevelopment
Housing mix We approve of the thought but feel the policy needs greater clarity.	23.Epping Society	No change to text
There should be a robust policy concerning a new sports centre before development of the current town centre site.	23.Epping Society	Agree: alter wording of policy 3 and 14
Conversion of the Epping Steam Laundry site for housing appears to be in conflict with other policies which promote employment for offices, studios, workshops and other commercial premises.	23.Epping Society	Steam Laundry site not appropriate to meet modern employment needs.
Disagree with the proposal for a hotel on the EFDC office site in the High Street and recommend instead a hotel on the St Johns Road site	23.Epping Society	Agree: remove hotel proposal from EFDC office site policy 3 and add possibility in St John's site
a visitor centre should be alongside future ETC offices	23.Epping Society	Agree: change policy 10
A proposal for 50 housing units at the Bell Motel is very confusing, should only replace the modern blocks with more than 50 units with landscaping on the roadside	23.Epping Society	Policy should not be too prescriptive: roadside area has potential for highway/junction improvements, to ease congestion.

		No change to text
Policy 4: This has our support. We would like to see an additional policy which opposes the replacement of characterful established homes with blocks of flats and back-land development of closes.	23.Epping Society	Need list for 'local listing'
Transport & Accessibility: Policies 6,7 & 8		
Suggests extending some of the Mayor of London's Transport Strategy policy objectives to Epping – promotion of Healthy Streets, rebalancing the transport system towards walking, cycling and public transport, improving air quality and reducing road danger.	70.Transport for London	Epping is not within Greater London and does not benefit from the extent of public transport available there.
Not aware of any current proposals to extend Oyster ticketing to Roydon railway station – a matter for the operator Greater Anglia;	73.Transport for London	Noted
TFL does not have any current plans or funding available to restore Central Line services beyond Epping to Ongar or North Weald Bassett – TFL recommends that specific references to extension of Central Line services is removed from the Neighbourhood Plan.		Noted but recommends retaining the option for the future
The Mayor of London's approach to car parking is set out in the draft Local Plan is to limit its provision in new developments and to encourage car free developments in areas with good public transport access.	74.Transport for London	Noted – however there are different transport circumstances in Epping
As a (minor) factual point: 'the roundabout beyond the M25' is generally referred to as 'the Wake Arms roundabout'.	75.Essex CC	Noted
The transport interventions being pursued is to address network issues from north of Epping through to the M25 to mitigate planned growth rather than to deal with congestion already experienced – which would take land from Epping Forest Special Area of Conservation.	76.Essex CC	Noted – given the current congestion problems, the levels of development proposed (and in EFDC SVLP) will require considerable investment.
Paragraph 6.8 – text box (p. 19) suggests add further priorities to the top of this text box: reducing the need to travel (demand management); encouraging greater use of sustainable travel modes etc. pedestrian movements need to be prioritised throughout Epping, particularly 'desire lines' to the station and town centre. It is noted that much of the congestion through the	77.Essex CC	Various local factors mean that cycling and walking can only ever be part of the area's travel solutions. The Neighbourhood Plan notes that solutions lay outside the parish e.g. directing traffic towards the M11 in order to access
High Street is the result of the several pedestrian crossings leading to traffic delays. It is difficult, as a result of this, to address these resulting		London and M25.

delays without impacting on the town centre's economic attraction for shoppers and visitors – as pedestrians. These delays will also be exerting	Removing pedestrian crossings to ease traffic flows through the town is not the solution.
an existing influence on how people travel across the town, making walking and cycling more attractive options than would be the case if there were no/fewer delays.	
An extra lane at Bell Common traffic lights would need to impinge on Forest land – but on balance however (and given localised air quality issues) ECC does not oppose this measure. ECC identifies that no bypass option is available through currently proposed growth plans for Epping.	Development of the Bell Hotel site provides an option to alter the junction Noted
'Infrastructure to support South Epping' and measures re Brook Road / Bridge Hill) need to be clearer	Noted – review wording of Policy 5
provision of 'improved traveller information tools' might be useful in the local context – a review of the local route signage, satnav to avoid congestion,	Noted – this should be part of the response to local traffic issues
'car-parking charges structured so that car-usage isn't the primary option and to reflect true costs and encourage alternative travel where feasible,' needs further consideration to identify proposals in practice. Parking availability and pricing (approached holistically) is a demand management tool not referred to in the NP as currently drafted.	Include car-parking management more clearly in the Neighbourhood Plan text of Section 6 / policy 7
ECC acknowledges that 'worker flex-time, home working' (and other measures) can be helpful in reducing travel demand and in reducing peak time traffic movements. Such measures would need to be encouraged and implemented through work-place travel plans, where these are in place.	Noted
Paragraph 6.10 focus is on road based measures, should be on reducing the need to travel, and prioritising sustainable travel.	Noted

Paragraph 6.11 Car Parking: ECC notes that the 2 nd bullet point included at paragraph 6.9 (p19), copied above, suggests a car parking measure which is not mentioned here in this car parking section.		Noted
<u>Policy 7 ECC</u> advises that 600+ additional public car parking spaces in Epping will draw in more car traffic, exacerbating the congestion problems on which much of the NP content focuses.		Noted – however there are few alternatives proposed by relevant agencies to address the problems, which will worsen during re- development of the three main town centre car parks
Accessibility & Connectivity section (section 6) Community Aspirations (p19) paragraph 6.4 Generally; this needs to reflect the sequential approach favouring sustainable travel modes in the first instance and the elements re- ordered to start from the important premise of reducing need to travel, encouraging non-car modes (walk, cycle, bus, tube, rail), and any general traffic road improvements to be last (or remove these road focused references if appropriate).	78.Essex CC	Noted – however there should also be funding sought from Housing Infrastructure Fund to support new development
ECC advises that there is a potentially higher expectation of the highway improvements cited in the NP, at key junctions around the town, than can demonstrably be delivered in reality, given the constraints of highway land availability etc. within the Epping Forest (much of this land instead being held by the Corporation of London).	79.Essex CC	Noted – but there is little evidence of agencies' investigation of traffic demand measures, use of technology or funding from HIF (see above)
Accessibility & Connectivity section (section 6) Community Aspirations (p19) paragraph 6.4 Generally; this needs to reflect the sequential approach favouring sustainable travel modes in the first instance (see Sustainable Travel comments). Accordingly, the elements identified need to be re-ordered to start from the important premise of reducing need to travel, encouraging non-car modes (walk, cycle, bus, tube, rail), and any general traffic road improvements to be last (or remove these road focused references if appropriate).	80.Essex CC	Alter para 6.4 to reflect travel modes Noted - however the Plan notes that some solutions lay beyond the parish boundaries.
1 st bullet point, ECC advises that for Epping there are very few 'route options', and such real-time traffic information would be likely to lead to use of less suitable routes.		Noted – see above

3 rd bullet point: Extending the Oyster card system coverage to Harlow or Roydon / reducing the higher fares payable from Harlow or Roydon stations (than those from Epping) is more likely to have greatest impact on reducing Epping station usage and commuter car parking demand/travel to Epping than to Roydon. ECC advises that there is also not spare capacity at Roydon station for increased car parking demand that could result from this. 6 th bullet point: Junction improvements cited are noted but do not effectively ease congestion by themselves and need to be viewed as part of a wider transport strategy. Experience from road capacity enhancement measures indicates that any additional road capacity might be taken up by existing suppressed demand and increased journeys as a result of this.		Noted – the Neighbourhood Plan would welcome a wider transport strategy that responds to projected congestion levels
The SEMPA believe that new roads to serve South Epping are an integral part of development in order for the new residents and users to properly access homes and facilities.	81.David Lock Associates (on behalf of SEMPA)	Noted
The existing pedestrian crossing over the railway could be improved to ensure a sustainable connection is provided between the eastern and western side of the South Epping Masterplan Area.		Noted – the comment needs to be supported by evidence that the current road network – Ivy Chimneys / Brook Rd – could cope even with proposed modal shift and the anticipated levels of development
Technical transport assessments have been undertaken that suggest only a sustainable crossing over the railway with no vehicular access would create an effective form of traffic alleviation from the existing problems along Ivy Chimney's Road, Bridge Hill and Brook Road.		No change – the proposal is not to create a southern bypass but to avoid added congestion on Ivy Chimneys / Brook Rd.
It has been suggested that a strategic link road to be used by all traffic could be provided to connect the sites to the east and west of the Central Line which form the South Epping Masterplan area. We strongly question the benefit of this link		This would not address a range of vehicles - services, utilities, deliveries, emergency, refuse vehicles etc. The anticipated industry

road in terms of performing the function of a southern bypass of Epping.		growth is in electric cars – residents in an edge of town site will need good access to transport
We are able to provide sufficient space adjacent to the railway line within our site however, to enable a comprehensive bypass solution to be constructed in the future for the entire Town. There may be some merit in providing a sustainable link through the sites and across the tube line, to be used by pedestrian, cycles and public transport only, encouraging people to use more sustainable modes of transport, and thereby having a beneficial impact on the local highway network,		
agree with the problem identified in the first sentence and regard this as the predominant issue for the whole NP (and the LPSV).	84.Epping Society	Noted
Certain junctions could be improved by using non-forest land so we recommend those options should be considered before forest is taken.		Agreed: add text Certain junctions could be improved by using non-forest land so we recommend those options should be considered before forest is taken
Plus a range of measures to reduce traffic and control commuter parking		Agreed
South Epping development will spew onto existing congested roads and further exacerbate problems at the known pinch points		Noted
a multi-storey car park at Epping Station here would serve commuters more effectively than any other solution and it might reduce demand for parking in residential roads.		Agreed
A great deal of thought and considerable amelioration will be necessary in order to protect and improve the entrances to the town otherwise its character could be irredeemably damaged.		Noted
Town Centre Policies 9,10,11,12		
disagree with increasing the primary frontage, mainly because existing retailers are struggling.	86.Epping Society	Review primary and secondary frontages – exclude from St John's scheme

propose that Article 4 changes should exclude permitted development along primary or secondary frontage because offices are an important aspect of the town which are being lost with an adverse impact on employment.		Unclear what the objective would be
Design of St Johns development should be a credit to the town and not a disgrace nor a competitor to the High Street, should include A2 (professional) and D1 (for a library), plus a supermarket, the scale of development should respect existing nearby buildings however, there should not be an absolute prohibition of taller Buildings.		New options for St John's to be developed – to include priorities for hotel, leisure and sports and residential
Recommend the exclusion of ground floor residential use should be more strongly expressed.		Agreed – review wording
We ask that Article 4 ruling be applied so permitted development to residential on upper floors would be excluded in primary and secondary frontages.		Not agreed – upper floor residential can add vibrancy and security
Any replacement or new shop front should be of a market town character and image.		Agreed review wording
do not see any reason to extend the primary frontage along St John's Road as it will tend to detract from the High Street which is the primary feature of our market town character.	87.Epping Society	Review
Support a town centre hotel on St John's Road site		New options for St John's to be developed – see above Agree
encourage a stronger promotion of the market, aAdditional public toilets and more public seating		
Suggest improved local signage to assist visitors to find the station, High	89.Epping Society	
Street and the forest (and other key sites too).		Agreed

Access to the Forest should be improved		Agreed
Employment: Policy 13		
the policy approach does not address protection and retention of existing employment uses	90.Essex County Council	Review policy
there is not any mention of a policy with regard to resisting change of use from employment to other uses		Add policy resisting change of use (see ES proposal for Article 4) And changes in the policy wording that state an aspiration to support the retention of existing employment areas, especially office-based employment sites and that proposals which result in the loss of an existing business use will be resisted, unless it can be demonstrated that its continued use is no longer viable – consistent with emerging EFDC Local Plan policies. Review policy
the NP could usefully go further in how it would wish to see the local economy sustained and promoted with changes in the policy wording that state an aspiration to support the retention of existing employment areas, especially office-based employment sites and that proposals which result in the loss of an existing business use will be resisted, unless it can be demonstrated that its continued use is no longer viable – consistent with emerging EFDC Local Plan policies.		Add policy resisting change of use (see ES proposal for Article 4) And changes in the policy wording that state an aspiration to support the retention of existing employment areas, especially office-based employment sites and that proposals which result in the loss of an existing business use will be resisted, unless it can be demonstrated that its continued use is no longer viable – consistent with emerging EFDC Local Plan policies.
support the Town Council's ambitions to improve the visitor economy	92.Epping Ongar Railway	Noted
recommend that the NP calls for use of "Article 4" designation to prevent the loss of any more central office facilities.	93.Epping Society	See 90 above
Development of Steam Laundry and EFDC offices for non-employment uses conflicts with this policy area		Noted – review designation
a number of building sites in any development area exceeding (say) 50 dwellings (not flats) should be designated for construction by local small firms.		This is beyond the scope of planning policy but could be added as an aspiration, but would need definition of 'local'

68.Epping Society	Agreed
	Noted and agreed
	Noted and agreed
	Noted and agreed
	Noted – not part of N.Plan
	Noted – to be included in Masterplanning
	These comments are unlikely to viewed as reasonable basis for removal of pd rights.
	Noted
	Parking is viewed by the public as a major issue, this represents additional provision.
Sports Clubs	Agreed that the future provision of sport and recreation facilities need to be updated but no case for additional sites at present. EFDC SVLP has sufficient sites to meet SHMA. No evidence for additional housing in Epping parish. Any development west of Bury Lane would be a major incursion into the green belt and would require clear justification, major infrastructure and services
	68.Epping Society

Residential Amenity: Policies 15,16 & 17	·	
The SEMPA supports the provision of an appropriate balance of housing types in respect to the surrounding character of the built environment in South Epping as well as the drives of market demands.	94. David Lock Assocs	Noted
Policy 15 – Due regard needs to be made of the impact of increased railway operations along the branch	95.Epping Ongar Railway	Noted
Policy 15 supports the reference to use of the (Essex) Design Guide in the interests of securing quality design and sustainability.	96.Essex County Council	Noted
extraneous noise should be guarded against as well so residents at South Epping are not troubled by the proximity of the M25. The policy should also address non-noise pollutants, such as particulates and gases.	97.Epping Society	To be included in masterplanning work
Unless Article 4 is adopted the aspiration to preserve bungalows will not be possible.		This could be considered if Housing Needs survey provides evidence of need
The proposal for basements is too demanding and a better solution would be to ensure developments generally and alterations do not cause unreasonable nuisance.		Review wording of policy
The proposed development at Coopersale Cricket Club is promoted for between 19 and 28 dwellings, and as such affordable housing would need to be provided = sites elsewhere in the area are too small so affordable housing would not be forthcoming.	98.Carter Jonas LLP on behalf of Chisenahle- Marsh Estates Company	Noted
agree there needs to be a balance of housing types in the town and believe the housing market should be the normal way to resolve it. Whenever housing types are mandated or encouraged it should be with a view to variety and higher density so additional Green Belt is not consumed	99.Epping Society	Noted – but conflicts with 97 – preservation of bungalows Agreed Noted – but could conflict with higher density proposals
prefer a definite commitment to good design		To be investigated
propose opposition generally to overdevelopment.		

Theydon Grove should be made a Conservation Area		Noted – would need evidence of particular qualities, heritage or architectural features
vigorous search for valuable local buildings which should be proposed for listing. And fFind a way of making "local listing" more persuasive		
Heritage: Policy 18		
The Plan should contain a clear map that shows the boundary of the Neighbourhood Area and extent.	104.Historic England	Agreed: add map showing conservation area boundaries
We would also recommend that designated and non-designated heritage assets, such as Conservation Areas, listed buildings and Buildings of Townscape Merit etc, are illustrated on maps in appropriate locations throughout the plan.		
You can also use the neighbourhood plan process to identify any potential Assets of Community Value in the neighbourhood area.	109.Historic England	Noted
Communities that have a neighbourhood plan in force are entitled to claim 25% of Community Infrastructure Levy (CIL) funds raised from development in their area. The Localism Act 2011 allows this CIL money to be used for the maintenance and on-going costs associated with a range of heritage assets including, for example, transport infrastructure such as historic bridges, green and social infrastructure such as historic parks and gardens, civic spaces, and public places.	110.Historic England	Plan needs to identify how this resource could be used in delivery of Community Aspirations
Further information and guidance on how heritage can best be incorporated into Neighbourhood Plans has been produced by Historic England, including on evidence gathering, design advice and policy writing.	111.Historic England	Noted
regret that too many buildings of merit have been altered to their detriment or demolished because policies were not developed in time or breaches were not dealt with.	112.Epping Society	Noted
Note that local listing has little practical effect.		Noted
Note that public bodies can be as insensitive to preservation as developers and mention the loss of the characterful court building,		Noted

 likely modification of the police station and dilapidation of the Centre Point building, as well as the loss of Pearce's Bakery and the Half Moon in the main street of the town. Propose that smaller or even individual terraces or properties should be protected, including the Duke of Wellington (which is a classic pub building of its era, developed by Cannon Brewery Co Ltd), Hemnall Social Club, etc. Although a twentieth century structure, we consider the fire station to have merit. 		include in review of local listing - Duke of Wellington ph, Hemnall Social Club, Fire Station
Policy 18 The final sentence would be more NPPF compliant if it was positively worded instead: i.edevelopment of or changes of use <u>'will be</u> permitted if the proposals preserve or enhance the building's historic and architectural interest'.	113.Essex County Council	Agreed – alter wording of Policy 18
General Comments Historic Environment Characterisation has been undertaken for the entirety of Epping Forest District and this should be consulted when considering the development / implementation of the NP. Section Specific Comments Paragraph 11.1 should read		Add to 'Implementation'
'The heritage and public realm are important factors in the distinctive appearance and unique nature of the parish. <u>The Essex Historic</u> <u>Environment Record maintains a list of all the heritage assets in Essex,</u> <u>both designated and undesignated.</u> There are 134 heritage assets recorded for Epping parish, 62 of which are Listed Buildings, the Epping <u>Forest Purlieu Bank is a Scheduled Monument and Coopersale House</u> <u>has a Registered Park and Garden.</u> The remaining 70 heritage assets range from excavation sites in the town centre, to Roman metal- <u>detecting finds to industrial archaeology associated with the railway.</u> <u>Historic Environment Characterisation has been undertaken for the entirety of Epping Forest District</u> '		Agreed – change wording in 11.1

Policy 18This policy needs to include all of the heritage assets as identified on the Historic Environment Record, including the below-ground archaeology and non-designated built assets, or be specifically targeted as a Conservation Area Policy, which would then require a further policy on the remaining heritage assets, in line with NPPF.Community Aspiration (Page 38): Enhancing the Parish's Heritage and Public Realm Consideration should be given to the below ground archaeology and the undesignated heritage assets within this section.		Agreed
Sustainability: Policy 19		
pleased to note the various proposals set out in Policy 19 of the NP. The pressures on local and global environments are increasingly significant, with concerns that 1. The Policy is couched in terms of "expectation " and	115.Epping Society	
"considered favourably". The funds coming to EFDC from central government and developers' Section 106 & CIL should make it possible to be more stringent with development, ie that such sustainable measures are "required" as a condition		Review wording of policy
of planning consent ii. The NP could go further than the National Framework, for example specifying solar energy, grey water systems, bicycle store, off-street bin storage, electric vehicle recharging points, access to non-fossil public transport within 100 metres, a minimum tree density etc are		As above
requirements for any development iii. Epping South could be designed and built as an "ecovillage" incorporating all the above and more. It could become a beacon for the rest of the UK, giving the residents and our community pride in what		To be discussed as part of maseterplanning
we will have, rather than just another edge-of-town estate. iv. The stress on SuDS is welcome, and we note that it should go hand- in-hand with good layout and landscaping, to create pleasant &		Noted
 interesting housing areas. v. We would like to see some of the measures of sustainability extended into the existing settlement of Epping, eg. Evpoints in the 		Noted

 High Street and car parks and solar panels being required on all new commercial buildings. Most important aspect of sustainability for the near future in our community is that of transport, with traffic congestion and air pollution as critical constraints. If these are not addressed, other sustainability measures will be of little import. 		Noted
South Epping Masterplan Area will aim to achieve high levels of sustainability through measures such as extensive walking and cycle connections throughout the site, which connect to existing rights of way surrounding the site, SuDS in locations that have undergone technical assessments, a mix of dwelling types, local services and other facilities, plus infrastructure provision to integrate the area with its surroundings'	116.David Lock Assocs.	Noted
The proposed development at Coopersale Cricket Club will meet the relevant sustainability, energy efficiency and water conservation standards. The site is located within Flood Zone 1 which means it is at low risk of flooding. It is proposed to include a balancing pond at the south-westerly corner of the site to provide on-site drainage, in order to meet sustainable drainage principles. Coopersale is served by buses which means that it is accessible to the services and facilities within Epping town centre and to Epping Station by public transport. It is also possible to walk and cycle within the village and to the nearest bus stops. Therefore, the proposed development would contribute towards reducing carbon emissions.	117.Carter Jonas LLP on behalf of Chisenahle-Marsh Estates Company	Noted
Sustainable TravelPolicy 6ECC notes the reference in this policy to increasing car parking provisionat Epping station. Whilst it has been identified that this car parking	118.Essex CC	Agreed

 provision is under pressure for the station, any such proposals need considering in the broader context of the likely increase in car traffic on the local road network and how this needs managing / mitigating. <u>Community Aspirations: Accessibility and Connectivity Improvements Section (P19)</u> ECC notes the bullet points that mention increases in road capacity, such as extra lanes. Increasing the road capacity has the potential to induce a greater net traffic flow, so any such road capacity 		
increase measures need to be set within a broader strategic transport approach. The ECC approach is summarised as follows in the ECC Developers' Guide to Infrastructure Contributions:		
'When identifying solutions, priority must be given to promoting 'smarter choices' i.e. alternatives to private car use and those that make efficient use of the transport network. Essex County Council employs a sequential test under which measures such as travel planning will be looked at first, then schemes designed to enhance walking and cycling, followed by public transport enhancement and		Noted – however other comments doubt the effectiveness of travel planning / traffic management in Epping's situation
then highway works. In mitigating the impact of a development on the highway network, direct mitigation by the developer is preferred.'		Agreed
Paragraph 6.13 (p22) This deals with car parking improvements and in this context ECC advises of the need to ensure that the North Essex Parking Partnership (NEPP) is consulted with regard to parking policy and delivery arrangements.		Noted
Policy 8 (p22) This reflects the NP proposals for 20mph speed limits on roads around schools. This proposal needs to be approached with consideration of the means and availability of resources to police and enforce the 20mph speed limits.		
TW have commented on the emerging Epping Forest Local Plan and support the inclusion within the Local Plan of Policy DM15 in relation to flood risk, DM16 regarding surface water drainage and DM18 in relation to water and wastewater infrastructure	48.Thames Water	Include cross-reference in text

although some amendments have been put forward in relation to Policy DM18. For clarity of requirements it may be beneficial to include cross- references to these policies in the sustainability chapter of the Neighbourhood Plan.		
ECC Minerals and Waste Planning Role – Overview and Safeguarding Minerals Development extant policy is set out within the Essex Minerals Local Plan (MLP) (adopted 2014). In respect of waste planning issues, extant policy is set out within the Essex and Southend-on-Sea Waste Local Plan (WLP) (adopted 2017). The WLP includes site allocations and policies to guide	119.Essex County Council	Noted
future waste development in Essex up to 2032. <u>Paragraph 2.4</u> The third bullet point refers to the 2001 Waste Local Plan. This Plan was superseded by a new Essex and Southend-on Sea Waste Local Plan in 2017. No comment on sites allocated.		Noted – amend para 2.4 Noted
Area fronting Birch View may be Corporation of London land (2)	120.Individual comment	Noted
Former Police Station – sold essential services are leaving the town	123.Individual comment	Noted – omit Police Station from policy 3
Review / improve photos used to illustrate issues and policies	124.Individual comment	Noted
map 1 – the colours used are not clear. Perhaps use different colours and or dots/dashes to make clear?	125.Individual comment	Noted

Page 22 6.13 explain acronym ANPR on first use	126.Individual comment	Noted – amend ANPR to full words
Page 46 - higher density on Underground car park and the St Johns site?	127.Individual comment	Add to review of proposals