

Epping Neighbourhood Plan Advisory Committee response to Epping Forest District Council Local Plan Draft for Consultation 2016

Version Control

Version	Date	Author	Comments
1	13/10/2016	MDS	notes from Advisory Committee 13/10/16
2	28/10/16	MDS	Incorporates notes from Neighbourhood Planning Advisory Committee 24/10/16
3	16/11/16	MDS	Redraft following NP Advisory Cttee 15/11/2016 plus notes from ETC Ex Mtg
4	24/11/16	MDS	Plus details from NPAC on specific policies and after meeting 24th Nov.
5	8/12/16	MDS	Corrections and wording changes to paras 3.5 - 3.7
6	9/12/16	MDS	Alterations following N. Plan Ad. Cttee 8/12/16

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Annex A Comments on Policies

1. Summary

1.1 The Group preparing the Neighbourhood Plan welcomes the preparation of the Epping Forest District Plan and while agreeing with a number of the policies in the Draft for Consultation, the Group does not consider the Draft meets the requirements of the National Planning Policy Framework with regard to preparing for sustainable development in Epping.

1.2 The preparation of the Neighbourhood Plan is being undertaken not to oppose new development, but to ensure that the growth of the residential community and the proposed heritage-based visitor enterprises are supported by adequate facilities and suitable transport provision and don't alter substantially the nature of the town.

1.3 The Neighbourhood Plan also seeks to protect Epping Forest and the green spaces which contribute most to the natural environment, charm and appearance of the area, while releasing suitable spaces to meet housing

needs over the Plan period. As presently proposed, the Draft Plan would involve a disproportionate loss of Green Belt for Epping.

1.4 As such the Group supports some sites, opposes some and has strong reservations over others allocated for residential development in the Draft for Consultation. This response to the Draft for Consultation includes suggestions and proposals to address the questions of how many new dwellings should be allocated to Epping over the Plan period and where they should be built. A key element of this response is a proposal for 'South Epping' as a sustainable urban extension located on the southern side of the town.

1.5 This response to the Draft for Consultation identifies site allocations for:

- in excess of 1100 dwellings (subject to densities) - comprising some of the sites within the Draft plus some alternatives
- site allocations for a new health hub, a heritage centre, new school, leisure centre, hotel, and a tourist information facility
- areas for specialist housing, for elderly (semi-independent living units) and young / affordable homes.

1.6 The proposals contained within this response reflect the emerging Neighbourhood Plan for Epping.

1.7 The Group welcomes the recognition within the Draft For Consultation of Epping as one of the two main centres within the District. It's position within the London Stansted Cambridge Corridor is noted, and the proposal for a heritage / tourism role for the town in relation to Epping Forest supported. This response includes a proposed town centre site for a hotel development to support both leisure and business visitors to the town, Forest and LSCC.

1.8 It is the strongly held view of the Group that the vitality and viability of Epping will only continue with suitable and adequate facilities within the town and sustainable transport to connect with the surroundings and into London. This response recommends the safeguarding of land for station improvements and the extension of the Central Line at least to North Weald Bassett. Without the extension of this vital rail service there will remain a strong desire for people to drive to Epping to access the London Tube rail network with consequent implications for pollution, congestion, and demand for commuter car parking, all-day parking in residential areas to the detriment of residents.

1.9 Some of the sites proposed for residential development will require masterplans or design briefs to be prepared and adopted to ensure provision of necessary infrastructure and facilities:

- St Margaret's hospital - to provide semi-independent living, supported / care home development including health care facilities plus new community health hub
- South Epping
- Bell Hotel site
- Town centre car parks
- Tube station car park
- Police Station - conversion to heritage centre and tourist information (ground floor) with flats above.

1.10 This response contains strong reservations over a number of sites, because of their impact on the environment, or the impact on the lives and amenities of nearby residents.

1.11 Several of the sites proposed for development within and around the Town will require inclusion of protection for important trees, hedges, open spaces, and the provision of walking routes / cycle lanes to connect sites to the town centre in design briefs. S.106 provisions will need to be negotiated to include provision of

sustainable transport facilities - e.g. distributor roads, car-charging points, pedestrian / cyclist routes, bicycle parking, bike hire, signposting and information boards.

1.12 The Group recognises the limitations and constraints imposed by the town's position and surroundings, notably the preservation of green countryside and Epping Forest itself, preventing new road-building or road widening. The forecast of improvements on the Central Line which might increase capacity by up to 25% in future (see ARUP report on infrastructure 5.2.3) dependent upon Transport for London plans and investment is noted. However this may only represent the status quo as there has been a 25% increase in stations usage on the Central Line in the last seven years. Thus if the whole line usage goes up at the same rate the capacity from Epping will be used up in seven. At peak times there is no spare capacity west of Leytonstone now, and there should be two or three stations past there to connect to other lines. This along with the highway constraints limits the potential for sustainable transport and related growth. However cycling and walking are not considered to be viable transport alternatives to the needs of 21st century residents, commuters, elderly, shoppers, etc. and will not solve the town's traffic problems.

2. National Planning Policy Framework

2.1 In preparing this response the Neighbourhood Plan Group has regard for the provision of the National Planning Policy Framework (summarised below) and how they apply to Epping:

The purpose of the planning system is to contribute to the achievement of sustainable development.

Policy 7. three dimensions to sustainable development, not be undertaken in isolation, because they are mutually dependent:

- **an economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time including the provision of infrastructure;
- **a social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- **an environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

9. Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life.

10. Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.

17. Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These 12 principles are that planning should:

- *be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area.*

29 - 41 Promoting Sustainable Transport

47 - 55 Delivering a wide choice of high-quality homes

69-78 Promoting Healthy Communities

Policies 79 - 92 Protecting the Green Belt

NB Policy 83 concerns the re-drawing of the Green Belt boundary which may be required in light of the proposals in the Draft Plan.

2.2 Vision for Epping: A key part of the Neighbourhood Plan preparation has been the development of a Vision and supporting aims:

A community proud of its quality of life, the potential of its market-town heritage, proximity to London, and its strong links to the Forest, ready to maximise its potential as a destination of historical importance. A community ready to embrace new housing, infrastructure and jobs, facilities and amenities, with a town centre which is working, sustainable, varied and vibrant containing a balanced mix of retail, commercial, employment and residential developments, attracting residents, visitors and tourists to its varied commercial, arts, recreation and cultural offers.

2.3 Aims to support the Vision:

- a) To respond to local housing needs with a mix of dwelling types, where new housing respects the town's quality of life and is integrated without materially damaging the local environment and has easy access to transport,
- b) To shape development within the town centre to create a range of retail and other appropriate commercial activities, contributing to the area's vibrancy and attractiveness respecting Epping's scale, heritage and character
- c) To ensure a mix of leisure and recreational facilities plus improved infrastructure such as schools, transport, medical and other facilities for all age groups, particularly for young people
- d) To retain and enhance the town's historic buildings, Charter market, conservation area, and links to the Forest and green belt
- e) To identify improvements to *the existing transport and car parking network* for travel within Epping, connections to London and neighbouring areas, supporting the future of the community with accessibility and sustainability at its core
- f) To enhance the appearance of the historic town centre through improvement to the 'public realm' which provides a frame for the town's activities, enhancing its appearance and heritage
- g) To identify opportunities which encourage the development of enterprise and expertise promoting jobs within tourism and other commercial activities, and maximise Epping's potential as a destination of historical significance, a centre for the area's arts, recreation, cultural and heritage offers.

2.4 A number of factors which contribute to the quality of life in Epping which should be respected in the proposals and policies:

- sense of community
- natural environment
- the character of the town
- links into London and the associated employment opportunities
- sense of scale
- an 'island' identity in the midst of the Forest.

3. Comments on the Draft for Consultation

3.1 The Group preparing the Neighbourhood Plan broadly welcome the publication of a Draft Plan; the absence of an up-to-date Local Plan based on robust research and consultation would leave the District open to casual, speculative and fortuitous planning applications being approved. However the aims of the Draft Plan to reflect the character of the towns and communities aren't matched in the detail of new dwelling distribution, the numbers proposed at Epping plus the loss of hospital, sports and leisure facilities, will create sprawl and alter the nature of the town from market towards dormitory town.

3.2 The number of houses proposed for Epping represent a significant increase over the current, with the risk that unsuitable and excessive expansion on this scale would alter significantly the character of the town. The number of houses proposed for Epping and the loss of key facilities for 'brownfield' residential development don't match the 'vision' for the town as set out in the Plan

3.3 The Neighbourhood Plan Advisory Committee (NPAC) welcomes many of the policies in the Draft Plan - new job delivery, town centre development and regeneration, site allocations around Harlow, place-shaping, varied new housing densities, SP 5 Green Belt and District Open Land, protecting the Natural Environment, Landscape Character and Green Infrastructure, Habitat protection, Housing Mix and Accommodation Types, Affordable Housing, Town centre Hierarchy, Shop Fronts and the Visitor Economy.

3.4 The NPAC objects to

- a) the level of new housing proposed for the town
- b) the lack of sustainable transport infrastructure for Epping and the adjoining areas to support the community, new housing, the town centre and the growth of proposed heritage-related tourism,
- c) the level of car parking to support the town of the future
- d) the following sites downgraded as District Open Land: SR0153, SR0071, SR0132Ci, SR0208, SR0404, SR0405, SR0555i (top corner: Birch View), 0406ii (Land known as Old Pastures) - these sites should stay as Green Belt.

3.5 The nature of the town and its surroundings, notably the extent of Epping Forest and the green belt place limitations and constraints on growth. For instance new road construction or road widening in order to increase capacity would be detrimental to the appearance and nature of the area. Such constraints place a limit on the level of new development which can be accommodated without eroding the nature of the town. The Site Selection Report states that insufficient land outside the Green Belt exists to meet the development needs of the District within the plan period. Further 'safeguarded' land to meet future development needs will be needed, but this won't be clear until after the next stages. (NPPF para 65).

3.6 The Plan covers the period 2011-2033 and has identified a need for 11,400 residential units in total for the District. No traveller sites are allocated for Epping The Town Council is not opposed to new development in and around Epping and is submitting i) a revised list of sites for residential development, ii) sites identified for necessary community and town-centre related functions including new heritage-related tourism, with iii) proposals for sustainable transport infrastructure. These revised proposals will be presented in the draft Neighbourhood Plan for Epping currently emerging from local consultation and detailed group work on key topics. The government's National Planning Policy Framework is the backbone of the draft Local Plan and this is very evident in the style of the Plan which reads quite differently from the current one. The EFDC Local Plan must be in line with government thinking and the Neighbourhood Plan will need to follow the same broad themes – at its core, sustainable development: economic, environmental and social. It is the view that the Draft Plan fails this 'test', achieving housing growth at the cost of the environmental and social aspects of the town.

3.7 The overall numbers of dwellings doesn't provide any indication of dwelling types e.g. flats or housing (the exception being some specific sites identified for flats). The Neighbourhood Plan would also seek to vary densities - flats, fully and semi-independent elderly / care homes - which could bring considerable changes to proposed totals.

3.8 The Draft Plan should show how infrastructure would be provided to support communities e.g. community health surgery. The plan lacks an indication of what infrastructure could be expected along with development.

3.9 There are concerns regarding possible watered down Sustainability report in the current draft plan compared to the sustainability report published in 2010. Quotes included in the 2010 report e.g. Natural England comments over nitrous oxide levels, are missing from the 2016 plan. Similarly, flooding risk comments have shifted down in the 2016 report.

3.10 Proposals for residential development will be expected to comply with the place shaping principles identified in Policy SP 4. Infrastructure requirements must be delivered at a rate and scale to meet the needs that arise from the proposed development, in accordance with the Infrastructure Delivery Plan.

3.11 Town Centre uses: In accordance with Policy E 2, in Epping Town Centre, at least 70% of the ground floor Primary Retail Frontage and at least 20% of the ground floor Secondary Retail Frontage will be maintained in A1 use.

4. Specific Plan Policies

4.1 Policies Supported: There are a number of specific issues within the Draft for Consultation which the Neighbourhood Plan support:

- a) The Draft Plan sets out the key elements of the district around which to build proposals - the economic and technology growth potential of the area and the environmental elements of the Lea Valley,
- b) The expansion of Harlow builds on its residential, economic and environmental successes to date and focuses new development on the West Anglia railway, one of the key elements of the LSCC.
- c) Protection for parks, gardens, green space, green belt and Epping Forest
- d) The protection of land required for key transport infrastructure
- e) Plans for the increase in tourism related to heritage and Epping Forest
- f) Mixed commercial and residential (flats / upper floors) developments (St Johns) which will enhance the vibrancy and vitality of town centres
- g) Protection for schemes and sites providing housing needs for older people
- h) Opportunities for small retail
- i) Opportunities for employment
- j) Basements policy
- k) Policies for the protection of heritage and 'at risk' buildings

4.2 Regarding specific policies, NPAC has a range of observations set out in Annex A.

Aspects of the Plan requiring alteration

4.3 **The Vision for / character of Epping:** The character of Epping is important to recognise, the factors which make it special and different are key to understanding the reasons people enjoy living and working in the town.

	suggested amendments
a) The scale of the proposed additional dwellings at Epping and the loss of key sites providing key services (for 'brownfield' development) will further erode the 'market town' character, promote the location as a commuter	The response from Epping Town Council includes proposed site allocations for housing and other essential land-use requirements, which will support the aim and vision for the town and the community.

town, and threatens to make it a London dormitory.	
b) Any new development will need to adhere to a level of car parking standards which improves the present situation where residential areas are clogged with on-street parking.	Review car parking standards.

4.4 New Dwellings in Epping: The distribution of new homes between different parts of the District fails to allocate the bulk to areas with the infrastructure - particularly good transport links - to absorb them:

- Epping - proposed 1690 dwellings equates to approx.3718 people @ 2.2 per home which represents 31.5% of the current population (est.11,800) the 2nd greatest increase in the Draft Plan
- Buckhurst Hill 90 (Pop. 2011=11,380) 0.8% of population - Central Line tube plus good proximity to M11 j4
- Loughton 1190 (Pop. 2011= 31,106) 3.8% of population - Central Line tube plus good proximity to M11 j5

4.5 The Draft Plan fails to address the road congestion and lack of car parking currently impacting on the functions of the town and the quality of life for its residents, and proposes the replacement of important services and infrastructure, e.g. St Margaret's Hospital, and using the sites for residential development but fails to identify a site for alternatives, such as a 'health hub' to maintain community health services. The lack of car parking and congestion in Epping already present obstacles to healthcare access in Harlow and Waltham Forest (Whipps Cross).

	suggested amendments
a) Site selection and housing numbers in and around the edge of Epping can't be supported by the level of infrastructure provision shown in the Draft Plan and the area's natural constraints and limitations.	See list of proposed sites for residential development (para 5.1 below)
b) Some proposed dwellings could be shifted to 'low quality / edge of settlement' Green Belt	See list of proposed sites for residential development (para 5.1 below)

4.6 Vision for Sustainable Transport/ More Holistic Approach to Transport to support new and existing housing:

The Draft Plan relies on highway modelling to support the distribution of development, and fails to embrace the possibility of more sustainable, challenging transport options through developing capacity within the rail system, park and ride schemes, enhanced bus services, and infrastructure for cycling and walking.

	suggested amendments
a) There is inadequate effective alternatives to car-borne transport in the Draft Plan. The Plan relies heavily on highways modelling and new / improved junctions on the M11 to determine the spread of new housing in Epping and adjoining areas, instead of anticipating / requiring extended rail-related transport systems to enable a more effective residential distribution	Explore i) potential for Park & Ride to connect road and rail connections ii) the potential of the Heritage Railway to deliver regular peak-time services into Epping iii) the potential from connections to the Lea Valley Railway and Crossrail II iv) a guided busway (cf Cambridge or Dunstable/Luton) to relieve road congestion and connect road-rail connections v) extending the Central Line to stations at North Weald Bassett and Ongar

	vi) Extend Oyster system to Harlow to deter commuters travelling to Epping.
b) There is insufficient provision of sustainable transport infrastructure for the numbers of dwellings proposed at Epping	As above
c) The transport modelling behind the Plan needs to recognise that rail fares from Harlow into London on the West Anglia line are considerably higher than the Central Line from Epping, which encourages commuters to drive from Harlow to Epping for the daily commute	If the Draft Plan is unable to deliver a different approach to future transport provision, then the bulk of new housing north of the M25 should be focussed around the M11 junctions 7 & 7A and around Roydon railway station
d) The reliance on walking / cycling provision in the Draft Plan fails to recognise that these are only part of the answer for modern transport requirements - most existing and new households will continue to require car transport as part of their daily / weekly routines. There should be a distinction between provision of foot and cycle paths, the different travel modes have different needs and are increasingly incompatible.	If walking / cycling is to be a realistic component of the sustainable transport mix supporting the District in future, there must be realistic provision shown at this early stage - construction of cycleways and walking routes, protected from car and lorry traffic, integrated in the highways system to an extent that they make a demonstrable difference to the level of car journeys

4.7 New Dwellings in Epping Forest District:

The Draft Plan should embrace a number of different approaches to the distribution of new housing:

	Suggested amendments
a) The proposed allocation of new dwellings fails to recognise the need for low cost housing in villages in the District	Adjust policy H 3 Rural Exceptions to include allocation of sites for 5-10 dwellings in each village, managed by a Housing Association, to meet local low-cost housing needs
b) The Plan fails to allocate land within proposed employment areas / zones for work/live units	The availability of high speed broadband connectivity allows work-from home and / or work-live units as an alternative to allocating employment and residential areas separately.

4.8 Service and Facilities Provision in Epping: The provisions of the National Planning Policy Framework seek sustainable communities, supported by appropriate services and facilities. The Draft Plan has sacrificed local services in Epping in favour of residential development. Specifically, the Plan needs to show provision in Epping for

- health and pharmacy facilities,
- sports and leisure facilities,
- services to support integrated transport e.g. parking or park and ride connections to Central Line stations,
- a site for a hotel to support expanded leisure and business visitor accommodation,
- a site(s) for a heritage centre / tourist information facility,
- walk / cycleways and cycling facilities such as secure bike storage, bike hire,
- infrastructure to support visitors - signage, website information, etc

	Suggested amendments
a) The Draft Plan fails to recognise and make site allocation provision for the level of services required for the anticipated population growth	see submitted revised dwelling numbers and sites (below)
b) The Draft Plan fails to allocate sites for replacement facilities e.g. health hub / surgeries, and development of the sport / leisure centre	see submitted revised dwelling numbers and sites (below)

4.9 The delineations of the District Centre boundary, primary shopping area, plus primary and secondary frontages shown on Figure 5.5 of the Draft for Consultation - the 'Town centre Designations for Epping' need to be altered in line with other proposals within the Plan, namely the layout of the St John's development, the use / re-development of the current EFDC offices for hotel development, the impact of the Tesco store.

Unacceptable aspects of the Plan

4.10 There are a number of aspects of the Draft Plan which conflict with the emerging Neighbourhood Plan.

4.11 The Draft Plan allocates a disproportionate number of new dwellings to Epping, because:

	Suggested Changes
<p>a) The distribution of new dwellings across the District allocates relatively few to some of the larger communities with facilities and transport infrastructure capable of supporting larger numbers while loading excessive numbers on communities (e.g. Epping) lacking facilities - in some cases proposing development of housing in place of the town's sport, leisure and health facilities.</p> <p>Although the Draft Consultation proposes a loss of 1% of the Green Belt across the District, the impact within the boundary of Epping is several times greater than the District average.</p>	<p>The balance of housing allocations between areas north and south of the M25 need to be redressed.</p> <p>The balance of housing allocations need to be redressed to support the LSC corridor, placing homes as close as possible to areas of employment and higher education in order to reduce commuting.</p> <p>North of the M25, the balance of housing allocations need to be redressed between those areas where sustainable transport capacity increases are realistic options - M11 junctions 7/7A and stations on the West Anglia rail service.</p> <p>If an extension to the Central Line or regular peak-time services on the current heritage railway are possible, the balance of housing allocations need to be redressed between Epping, North Weald Bassett and Ongar.</p>
<p>b) The proposals for housing in Epping occupy key sites which would be required to achieve other aspects of the Plan, namely</p> <ul style="list-style-type: none"> • Epping as a centre for tourism linked to the town's heritage and place at the heart of Epping Forest • town centre parking required to support one of the two main town centres for the district 	<p>Essential to identify sites in Epping for</p> <ol style="list-style-type: none"> a) heritage centre /tourism promotion/bike hire etc. b) hotel / additional visitor bedroom capacity, c) restaurants and bars d) visitor car parking <p>see5.1 below</p>
<p>c) The Plan fails to use higher density developments in major urban centres, instead relying on medium density developments on green-field sites to achieve the required housing totals</p>	<p>See a) above</p>
<p>d) Essential services - especially primary schools and</p>	<p>Need to identify sites in Epping in line with revised</p>

health / GP / health visitors / care services are already over-subscribed or sites are shown for residential development and the Plan fails to identify sites for the expansion of these services over the lifetime of the plan	housing growth for a) additional primary school site(s) b) a health hub (within Health service plans after closure of St Margaret's, and other health facilities) c) new sports facility
e) the Plan fails to provide guarantees of essential facilities and services, instead taking an unbalanced focus on housing growth	The Draft Plan needs revisions to allocate sites for the range of essential services proportionate to the scale of growth in each area, respecting the scale and character of each area, and within the infrastructure and protected green spaces constraints.

4.12 Erosion of Epping's Character: The scale and location for new housing in the Draft Plan would create sprawl, altering the character of Epping. One example of this is the distances from the new sites to the town centre would be such as to deter walking (as population ages / less mobile / etc) and require car journeys, more town centre parking requirement, more congestion.

4.13 The Draft Plan fails to provide adequate sustainable transport infrastructure in relation to i) proposed residential development, ii) the economic and service functions of the town centre, and iii) the proposed heritage-related tourism, as required by the National Planning Policy Framework:

	Suggested amendments
a) The reliance on Epping's station on the Central Line to provide new housing with a commuter connection to the employment areas within London with no firm proposals for improving the line's efficiency or capacity	Revised limit for new development and link phased growth to agreed capacity increases Safeguard land for station development and line extension to North Weald Bassett
b) The reliance on highways modelling to find locations for development and the failure to explore options to extend the Central Line to its previous extent with stations at North Weald Bassett and Ongar thus allowing several distribution to more locations with more sustainable / less polluting transport is a major missed opportunity	The Plan re-drafting should be put on hold pending revised infrastructure assessment including options to extend Central Line
c) There are at present a number of highways 'bottlenecks' around Epping which create significant peak-times congestion and delays; the proposal for 1640 new dwellings around Epping with no corresponding improvement in transport infrastructure is unacceptable	Identify bottleneck locations and make capital allocation for improvements.
d) the constraints imposed by the extent of Epping Forest mean that significant road / transport infrastructure aren't possible.	Limits on proposed developments.
e) the age and quality of rail infrastructure would put extra pressure on roads in an area where there is little potential for highways improvements	Locate development in proximity to new / recently upgraded transport.

4.14 The Draft Plan fails to address the issue of car-parking problems in Epping:

	Suggested amendments
a) the loss of car parks - where allocated for development, would have a severe impact on the capacity and potential of the town to accommodate a) commuter and b) visitor traffic.	Policies in the Plan should protect the town centre car parking calculated to support the centre's future functions serving the community and as one of the District's two main centres, including the growth of heritage-related tourism.
b) safeguarding of land for station improvements and the extension of the Central Line at least to North Weald Bassett.	Without the extension of this vital rail service there will remain a strong desire by people to drive to Epping to access the London Tube rail network with consequent implications for pollution, congestion, and demand for commuter car parking, all-day parking in residential areas to the detriment of residents. The safeguarding of space should also allow for station & transport mode interchange improvements.
c) the temporary loss during construction if planned for parking and residential, would have a detrimental impact on the attractiveness of the town for visitors, shoppers, etc	The provision of temporary car parks during construction.

4.15 It's not possible to comment fully without knowing if other sites for residential development are to be included at a later stage; Beyond the range of sites for residential development (see list revised by ETC) there should be a firm presumption against further residential development of sites for more than 5 dwellings. There is concern about sites that could come into a revised Draft later and ones that have been eliminated but may return, that will not be consulted on.

4.16 The nature, extent and content of the Draft Plan consultation and the limited timescale leaves only time for individual communities to respond, which deters the achievement of a co-ordinated overview between all the towns affected by the issues they have in common raised by the Draft Plan. In the period post 12th Dec, invite reps from the communities with commonly-held concerns to seminars seeking solutions.

5. Epping: A. Revised List of Residential sites

5.1 The NPAC has reviewed at length the sites shown in the Draft for Consultation and proposes a different approach to delivering the numbers of new homes in and around Epping over the plan period. It is the view that the number proposed in the Draft for Consultation and the spread of locations is unsustainable in terms of the strain or loss of local services and facilities, the impact on traffic, transport and parking, and the erosion of areas of green and environmental quality. A revised approach would be to build in few locations, thus more likely to lead to coherent development which infrastructure and preserve the character of the town.

Acceptable With Conditions / Sites Carrying Possibilities / Strongly Oppose

5.2 The NPAC is opposed to a number of specific sites (see 5.3c below), would accept others (5.3a), recognising that the remainder have possibilities but require considerable alteration and master-planning before they could be considered as acceptable (5.3b). A major strand of the approach suggested by NPAC is to achieve an area of

new development by combining several of the sites in the Draft for Consultation off Ivy Chimneys Road into a 'sustainable urban extension' of homes, local services and facilities, plus infrastructure provision to integrate the area with its surroundings. This sustainable urban extension is described below as 'South Epping'.

5.3 This response to the sites suggested in the Draft for Consultation uses four categories:

- acceptable with conditions,
- sites with possibilities,
- unacceptable, and
- new / alternative.

a) Accept proposed sites for residential development. The following are sites shown in the Draft Plan for Epping which are supported with conditions:

Ref	Comments	Suggested number of dwellings
<p>South Epping</p> <p>The following sites are being put forward as a 'sustainable urban extension' on the southern edge of Epping, comprising homes, a local centre with facilities and offices, a primary school, sports facilities, open spaces, play facilities and the necessary supporting infrastructure to a) encourage walking / cycling into Epping and Epping Station, and b) a new road connection to the B1393.</p> <p>It should be emphasised that this proposal is only acceptable with a</p> <p>Masterplan giving absolute guarantees over the provision of the necessary additional infrastructure as this area (Brook Road and Ivy Chimneys) is at present prone to traffic congestion. This would include the necessary road easing, extra facilities and very importantly, strong noise and pollution screening from the motorway.</p> <p>Developer to pay for key infrastructure through legal agreements. The masterplan design would need to protect views and vistas and determine an outline layout.</p> <p>Their remains concerns over the loss of greenbelt land, however the Draft for Consultation recognises that some green belt will be lost in order to achieve the required new housing. The focus of development in South Epping prevents sprawl and encroachment into the green belt to the west, north and east of the town.</p>		
SR-0069 (land at Ivy Chimneys Road)	Suggest a mix of house types and maisonettes, some shared ownership;	
SR-0069/33 (land South of Epping)	Suggest a mix of house types and maisonettes, some shared ownership;	
SR-0445 (Greenacres, Ivy Chimneys Road)	mix of house types and maisonettes; but use whole site not just parcel identified by EFDC	
SR-0113B (land to the South of Brook Road)	<p>This site has vistas out to open countryside and towards the Coopersale Hall school, and a stream prone to flooding which would need careful planning. Suggest a mix of house types and maisonettes, some shared ownership;</p> <p>Infrastructure connecting this parcel and 0069/33 would be needed to replace the pressure on current Brook Road bridge. Parcel hangs on getting improved infrastructure – sustainable development opportunity.</p> <p>This site and Ivy Chimneys area is remote from the centre of Epping so would need some local facilities, and a school. Issues to promote cycle lane / walkway into Epping would need to be addressed plus the access for traffic into town and to main destinations.</p> <p>Without improvements to infrastructure and services / facilities to support new homes in this area, this is not sustainable development.</p>	

<p><i>Ivy Chimney sites in general</i> – sloped area affecting landscaping and views for current dwellings would need consideration. The sites' potential is linked to improved infrastructure e.g. road network to alleviate the current pressures on Ivy Chimneys currently, and infrastructure like a surgery in this area in the future. Planning for routes to various services e.g. tube, town centre, schools for the sites should be taken into account e.g. Brook Road to the town centre.</p> <p>Pollution mitigation measures must be put in for this area due to the accumulated pollutive impact of the M25, any additional roads and the increased traffic from extra development adding to a topic of great concern, as part of any Masterplan for the area and its infrastructure.</p>		
<p>There are sites not currently shown in the Draft for Consultation which EFDC may wish to review, whether any part could benefit the South Epping proposal. e.g. to facilitate access etc. : SR-0113A, SR-0333Bi and SR-0333Bii, SR-0406ii.</p>		
SR-0556 (Civic Offices, High Street)	<p>Site more suitable for new town centre hotel, directly supporting Local Plan policies. However a combined hotel / residential flats scheme may be possible with space for the homes if the present car park had the parking under new flats.</p> <p>Evidence that a good hotel is needed. Locate here and propose The Bell Hotel site for residential development. Visitors will use the town in this central location and support the economy.</p>	
		Approx / est. total 875 homes

<p>b) Sites Carrying Possibilities</p> <p>There are reservations over the following sites shown in the Draft Plan for Epping which would require a range of issues including pre-development infrastructure arrangements to be negotiated / agreed, safeguarding the amenities of nearby residents, replacement of necessary facilities and services:</p>		
SR-0229 (Epping London Underground car park and land adjacent to Epping Station)	<p>Would require a masterplan examining development in relation to the station / future station improvements, plus new improved access arrangements. Development of this site should avoid restricting future station enlargement or the possibility of extending the line in future. Consideration should be given to addressing the disruption during construction.</p> <p>Presumably flats with car park underground. Parking must be maintained plus the spaces for the new flats. Could parking be tiered to increase numbers and preserve green belt? The scale and size of the development needs careful consideration to avoid an adverse visual impact on this part of Epping.</p> <p>Set down / pick up facility needs to be enhanced at the station with cycle parking / storage facility as well as access to the proposed development.</p> <p>Would expect to see current parking plus extra provided for commuters or perhaps in the other car parks to improve business in town.</p>	approximately 80 homes - possibly much less depending on design, height etc
SR-0555 (St Margaret's Hospital Site)	<p>Some development of the site would be acceptable but suitable for semi-independent units for people with elderly or care needs plus a new 'health hub' with integrated GP, community health, podiatry, and other health services and pharmacy.</p>	approximately 181 100 homes

	<p>Development should also plan for a school and transport into the town centre. Development with conventional housing would generate unacceptable levels of additional car traffic.</p> <p>The site could include the long green area in front of the flats next to St Margaret's Hospital, Birch View. Any development should be low rise flats to protect setting and neighbours.</p> <p>There's a need to keep core facilities such as health, GPs, community nurse and health services in town. Many older residents can't take multiple buses to a distant central facility for basic health services such as blood tests. The overall approach for this site needs to be in the context of an overall health strategy.</p> <p>Congestion here is already dreadful. A problem now that will become a bigger problem with more development and traffic risking damage to environmental and air quality.</p> <p>The site could include long green area in front of the flats next to St Margaret's Hospital.</p> <p>If this site was phased towards the end of the plan phase when other facilities e.g. in Harlow were improved this would be better.</p>	
SR-0587 (Epping Sanitary Steam and Laundry co. Ltd, Bower Vale)	<p>Site has potential for mixed use - residential / employment / parking.</p> <p>Opportunity for a additional car parking – underground?</p>	approximately 22 homes
SR-0347 (Epping Sports Centre, Nicholl Road)	<p>Although outdated and old-fashioned, this would be a big loss of local facilities for the whole town which would need replacing . Access to the site should be improved.</p> <p>A better sports / leisure centre must be provided <u>within</u> Epping. <u>and before</u> the old one closes.</p>	
SR-0348 (Cottis Lane Car Park, Cottis Lane)	<p>Suggest a mix of flats with improved parking for the public</p> <p>Minimise displacement of parking. Business parking should be offered to local businesses, considering the development of St Johns too.</p>	Approx 50 homes
SR-0349 (Bakers Lane Car Park, Bakers Lane)	<p>Suggest a mix of flats; with improved parking for the public.</p> <p>Minimise displacement of parking. Gardens down St John's slope down meaning depending on the height of the building, gardens will be looked upon. Close to the high street. Business parking should be offered to local businesses, considering the development of St Johns too.</p> <p>This site contains the only public toilets in town.</p>	Approx 40 homes
		Total approximately 300

c) Strongly Oppose: the development of these sites is not supported. The following sites shown in the Draft Plan for development in and around Epping are opposed. The evidence for removing the following sites from the Draft Local Plan is the need to deliver instead a critical mass of new housing in order to achieve the infrastructure and environmental policies within the Draft Plan. Fewer larger sites will have greater scope to deliver the

environmental policies and transport infrastructure to support the new homes and avoid adding to the problems of congestion in Epping. The required transport infrastructure would be improved road connections to the B1393, walking /cycling routes to the Tube station and the centre of town, plus a new rail crossing / tunnel. Other infrastructure would be the services and facilities to support the proposals, plus a proportion of new homes as affordable housing.

<p>SR-0071 (land at Stonards Hill)</p>	<p>Development of this site would be sprawl and encroachment into high quality countryside with loss of important wildlife habitats.</p> <p>The site would have poor access to the main road system and a long walk-distance from the Tube station leading to increased car journeys, congestion and parking demand.</p> <p>The site is prominent with vistas over Canary Wharf.</p> <p>The Arup Report identifies</p> <ul style="list-style-type: none"> •Recreational pressure • Likely to affect priority habitats, which may not be mitigable • High character sensitivity detrimental to open and rural area <p>Development would be contrary to NPPF policies</p> <p>29 - 41 Promoting Sustainable Transport 47 - 55 Delivering a wide choice of high-quality homes 69-78 Promoting Healthy Communities 79 - 92 Protecting the Green Belt</p> <p>This is 'proper' countryside, green space, a corridor used by wildlife into the forest. Contains a big badger sett and huge diversity of wildlife. Access is by one private lane. Development would have considerable environmental consequences. The site is prominent with vistas over Canary Wharf. The piece of land has a vibrant environment and not possible to give up. Stream running through it and home to wide range of wildlife - development would be contrary to the Plans aims for bio-diversity and protection of important open sites. Currently used by many people for exercise. 'Proper countryside' when compared to Brook Road and Ivy Chimneys areas.</p>	<p>approximately 115 homes</p>
<p>SR-0132Ci (Epping Sports Club, Lower Bury Lane)</p> <p>Plus other land opposite outside the Epping parish</p>	<p>Development here would be a dangerous precedent for further outward expansion into the open countryside / green belt on the western side of the town.</p> <p>Development of the site would represent the loss of a sporting facility, cricket/tennis & bowls clubs, reducing the area's facilities while increasing the number of homes.</p> <p>The access down Lower Bury Lane is narrow and busy with school traffic and a long walk-distance from the Tube station leading to increased car journeys, congestion and parking demand.</p> <p>The scale of the proposed development would be insufficient to deliver infrastructure.</p> <p>The Arup Report identifies-</p> <ul style="list-style-type: none"> •Recreational pressure •Development must be sensitive to landscape character •Higher density than existing therefore likely will affect character. 	<p>approximately 49 homes;</p>

	<ul style="list-style-type: none"> • PROPOSED TO RELOCATE RECREATION USES TO HIGHER SENSITIVITY PART OF THE SITE <p>NPPF Contrary to Local Plan Policies</p> <p>Development of this site would involve the loss of cricket/tennis & bowls clubs when residents have told us sports facilities are very important. If the town is growing, we need more sports facilities in the town. The access down Lower Bury Lane is narrow and busy with school traffic. Not sustainable development.</p> <p>The fields used for sports, Creeds Farm to Cemetery are a natural boundary of Epping, with vistas into the town. Development here would be a dangerous precedent for further outward expansion. Swaines Green acted as a buffer zone, this just moving development to the other side</p> <p>Epping doesn't have much flat land – so where could the sports facilities be relocated? If facilities are relocated on the opposite side of the road, we would want reassurance that it would minimally effect the environment and protect against further development. Developing the opposite side of the road could set a precedent for future development and encroachment into the countryside. Access to the town centre is also distant. Loss of vistas from the road on to Copped Hall.</p>	
SR-0208 (Theydon Place)	<p>This land is part of Bell Common, a green playground with many walkers and a corridor site for local wildlife site including bats. Development of this site would be sprawl and encroachment into high quality countryside with loss of important wildlife habitats.</p> <p>The site would is a long walk-distance from the Tube station leading to increased car journeys, congestion and parking demand.</p> <p>The scale of the proposed development would be insufficient to deliver infrastructure.</p> <p>Arup Report •Recreational pressure</p> <ul style="list-style-type: none"> • High character sensitivity • Could significantly alter character of surrounding settlement • TPO trees could affect its suitability for development <p>NPPF Contrary to Local Plan Policies</p> <p>Proximity to rest of Bell Common is a concern.</p> <p>The site currently looking over this parcel sees right over into London which could be lost with development. Access issues with the current private road.</p>	approximately €€ 35/40 homes
SR-0404 Institute Road allotments	<p>Loss of an important facility. Development of this site would be sprawl and encroachment into high quality, green belt, countryside.</p> <p>Development of the site would represent the loss of a leisure facility, reducing the area's facilities while increasing the number of homes.</p> <p>The site would have poor access to the main road system and a long walk-</p>	

	<p>distance from the Tube station leading to increased car journeys, congestion and parking demand.</p> <p>Coopersale has insufficient services to support expansion, lacking the sustainability required within the National Planning Policy Framework.</p> <p>The scale of the proposed development would be insufficient to deliver infrastructure.</p> <p>Arup Report • Some direct loss of ancient woodland</p> <ul style="list-style-type: none"> • Allotments 80% of site, significant loss of public open space with few opportunities for reversion • Significant access issues would need agreement for new access road <p>Development would be contrary to NPPF policies 29 - 41 Promoting Sustainable Transport 69-78 Promoting Healthy Communities 79 - 92 Protecting the Green Belt</p>	
SR-0153 (land north of Stewards Green Road)	<p>Development of this site would be sprawl and encroachment into high quality countryside with loss of important habitats, green belt and risks sprawl into unspoilt areas.</p> <p>Development here would be a dangerous precedent for further outward expansion into the open countryside / green belt on the eastern side of the town.</p> <p>The site is on rising ground, views over countryside with the Essex Way runs through it, prominent countryside with vistas over Canary Wharf.</p> <p>The site would have poor access to the main road system.</p> <p>Development would be detrimental to the occupiers of these properties backing onto the site.</p> <p>This is the area with fewest community facilities but on a steep hill.</p> <p>The Arup Report identifies •Recreational pressure</p> <p>Development would be contrary to NPPF policies 29 - 41 Promoting Sustainable Transport 69-78 Promoting Healthy Communities 79 - 92 Protecting the Green Belt</p> <p>Field rises up away from the Orchards and development would be detrimental to the occupiers of these properties backing onto the site. The site has vistas over countryside with the Essex Way runs through it. Development would be severely detrimental for occupiers of neighbouring properties and will remove 'greenery' for the Orchards. Perhaps move development up the site towards the railway line where less damaging. This is the area with fewest community facilities but on a steep hill. Would need a local shop or services.</p>	approximately 305 homes
SR-0405 Coopersale	Development of this site would be sprawl and encroachment into high quality, green belt, countryside.	

Cricket Club	<p>Development of the site would represent the loss of a sporting facility, reducing the area's facilities while increasing the number of homes.</p> <p>The site would have poor access to the main road system and a long walk-distance from the Tube station leading to increased car journeys, congestion and parking demand.</p> <p>Coopersale has insufficient services to support expansion, lacking the sustainability required within the National Planning Policy Framework.</p> <p>The scale of the proposed development would be insufficient to deliver infrastructure.</p> <p>The Arup Report identifies some direct loss of ancient woodland</p> <ul style="list-style-type: none"> • Playing fields, school playing field and cricket ground. • Coopersale only open space could affect settlement's character <p>Development would be contrary to NPPF policies 29 - 41 Promoting Sustainable Transport 69-78 Promoting Healthy Communities 79 - 92 Protecting the Green Belt</p> <p>The loss of the cricket club would be contrary to Local Plan Policies concerning provision of recreation / sporting facilities.</p> <p>Coopersale Cricket Club is the only major open space in Coopersale and ridiculous to lose this section of the green belt and a sporting facility. Limited infrastructure between Epping, so more people would mean more traffic into Epping. Coopersale already taken a lot of development and its only a village Not enough properties to trigger new infrastructure and a school, etc. Why take away all the leisure facilities when residents want and need. Need leisure and recreation within walking distance of Coopersale This is a buffer area to the forest.</p>	

5.4 Alternative Sites. The following sites not shown in the Draft Plan have potential for residential development:

Police Station	retain building and facade as Heritage centre/tourist info (as Plan advocates) ground floor. Flats upper floors	6 flats?
St Johns	Increase residential element of St John's development proposal	30 homes?
Bell Hotel	Replace with sheltered or semi-sheltered / McCarthy & Stone type development	70?
		Total might be approx. 100 dwellings

Annex A: Comments on Policies.

Housing/Design & the Built Environment		
Draft Policy H 1 Housing Mix and Accommodation Types	largely in agreement for the whole policy with the following comments:	Provision for ageing population must be taken into account on every occasion. Policy E. The loss of bungalows comment needs strengthening as per the Article 4 direction.
Draft Policy H 2 Affordable Housing	largely in agreement for the whole policy with the following comments:	It should be offered to Epping residents first. Policy D. The mix of units should be subject to A, B and C of this policy.
Draft Policy H 3 Rural Exceptions	largely in agreement for the whole policy with the following comments:	Policy A. Requires a definition of 'affordable' Policy B. This policy was not agreed to as it was felt that there should be mixed sites.
Draft Policy H 4 Traveller Site Development	It was in agreement for the whole policy.	
Natural Environment		
Draft Policy DM 1 Habitat protection and improving biodiversity	largely in agreement for the whole policy with the following comments:	Policy D. Additional wording is added to this policy section to say 'and monitored by a suitably qualified ecological professional.' Policy E. Change 'will be strongly resisted' to 'will not be permitted' Policy F. Move this section to after C.
Draft Policy DM 2 Landscape Character and Ancient Landscapes	largely in agreement for the whole policy with the following comments:	Add in C. to policy with the following wording: 'Have regard to preserving long views to distant landmarks and landscapes of interest from key locations/viewpoints, for example London landmarks, Epping Forest. Add in D. to policy with the following wording: "Identify list of key viewpoints throughout the district.
Draft Policy DM 3 Epping Forest SAC and the Lee Valley SPA	in agreement for the whole policy.	
Draft Policy DM 4 Suitable Accessible Natural Green Space and Corridors	in agreement for the whole policy.	
Draft Policy DM 5 Green Infrastructure: Design of Development	in agreement for the whole policy.	
Draft Policy DM 6 Designated and undesignated open spaces	in agreement for the whole policy.	
Draft Policy DM 7 Heritage Assets	This should be a material consideration to strengthen	Policy F. It was commented that the protection of assets should be strengthened

	<p>protection for heritage assets, locally listed buildings with architectural and / or heritage importance locally</p> <p>largely in agreement for the whole policy with the following comment:</p>	<p>to preserve or enhance the older buildings and features of the town.</p> <p>The Half Moon PH, Pearce’s Bakery - Locally listed and demolished in the last 2 years. The Court House had no protection even though buildings by him in Chelmsford have a statutory listing. Friends Meeting House is locally listed. The Police Station is Building of townscape merit – but with even less protection.</p>
Draft Policy DM 8 Heritage at Risk	in agreement for the whole policy.	
Draft Policy DM 9: High quality design	in agreement for the whole policy.	<p>This must be good quality and reflect the character of the town and its multiple conservation areas.</p> <p>policy E – need more details of the Design Review Panel.</p>
Draft Policy DM 10 Housing Design and Quality	largely in agreement for the whole policy with the following comment:	<p>Policy A. Requires a definition of ‘high quality’</p> <p>As above re good quality</p>
Draft Policy DM 11 Waste recycling facilities on new development	in agreement for the whole policy.	
Draft Policy DM 12 Subterranean, basement development and lightwells	in agreement for the whole policy.	
Town Centre Function/Arts, Culture & Recreation	<p>Overall comments:</p> <p>We recognise that the Town Centre is facing challenges with the change in buying habits. The Neighbourhood plan will take account of :</p> <ul style="list-style-type: none"> • the Portas Review and the 2010 – 2015 and Government policy on High Streets and Town Centres • the current National Planning Policy • the appropriate section(s) in the EFDC Local Planning document and issues to be addressed in relation to managing growth and retaining the character of the Town <ul style="list-style-type: none"> ○ Parking ○ Adaptation of existing buildings ○ The market ○ Residential ○ Secondary House before – not residential at front ○ Etc. 	
Draft Policy E 1 Employment Sites – Existing Employment Sites	in agreement for the whole policy.	
Draft Policy E 2 Centre Hierarchy/Retail Policy	largely in agreement for the whole policy with the following comments:	<p>Requires clarity on provision for residential on the ground floor.</p> <p>Suggest possibly professional services to residential if once built as residential.</p> <p>Encourage retail in smaller centres.</p>

Draft Policy E 3 Food Production and Glasshouses	largely in agreement for the whole policy with the following comments:	Policy A. iv) What is the definition of 'adequate'? Policy A. vi) Suggest removing 'available' as regards adequate water resources. Policy B. The comment that with applications for major new development or for major expansion to existing sites, the Council 'may' require some additional plans – 'may' being referred to is seen as too woolly and having conditionality implications. Policy C. Change of use factors are too coveted.
Draft Policy E 4 The Visitor Economy	largely in agreement for the whole policy with the following comment:	Provision for supporting hotels in the area.
Draft Policy DM 13 Advertisements	in agreement for the whole policy.	
Draft Policy DM 14 Shopfronts and on street dining	in agreement for the whole policy.	
Draft Policy DM 15 Managing and reducing flood risk	in agreement for the whole policy.	
Draft Policy DM 16 Sustainable Drainage Systems	in agreement for the whole policy.	
Draft Policy DM 17 Protecting and enhancing watercourses and flood defences	in agreement for the whole policy.	
Draft Policy DM 18 On site management of waste water and water supply	in agreement for the whole policy.	
Draft Policy DM 19 Sustainable Water Use	in agreement for the whole policy.	
Draft Policy DM 20 Low Carbon and Renewable Energy	in agreement for the whole policy.	
Draft Policy DM 21 Local environmental impacts, pollution and land contamination	in agreement for the whole policy.	