
Draft Local Plan consultation 2016 (EFDC)



RESPONSE FROM EPPING TOWN COUNCIL

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Part One: Initial thoughts on the draft Local Plan

Epping Town Council have a number of concerns over the draft Local Plan and have spent a considerable amount of time analysing the proposals in detail. The Town Council appreciates that some growth must take place, but it is vital that the growth is proportionate, the site selection is correct, the infrastructure will be delivered to support that growth, its impact on the natural environment is minimal and no development exacerbates our existing issues such as parking and congestion.

Epping Town Council are concerned about the number of dwellings that have been proposed for Epping (1690 for our Parish; 1640 for Epping and 50 for Coopersale). The Issues & Options Consultation in 2012 proposed approximately 941 new dwellings for Epping (including Thornwood); the draft Local Plan 2016 now proposes 1820. Epping Town Council argue this is an unacceptable increase. Epping has received a disproportionate proposal of 1690 dwellings, which equates to an enormous increase based on a population of 11,500-12,000. We appreciate this is because Epping has more sites that have been proposed; but that doesn't make it an acceptable way of developing a town sustainably. Epping is notorious for its parking and congestion problems and the physical character and layout of the town would prohibit the development of a comprehensive road structure and as such, Epping cannot cope with such a disproportionate increase in population. We recognise people live here as they like the way it is now; a historic market town; and fear this level of development will change the character of our town.

Infrastructure is a key issue and it is very difficult for everyone to accept development without having the plans in place to ensure infrastructure will be delivered at the point of need and will request that the infrastructure delivery plan is more comprehensive, explaining how development will be supported. Whilst consideration could be given to sites such as Epping Sports Centre and St Margaret's Hospital, for example, we need to

confirm replacement provisions would be provided locally in Epping; not in neighbouring areas. Development must be sustainable; it must be change for the better and constitute positive growth. Epping Town Council feels this level of development is not sustainable. Epping Town Council believes that the definition of 'Sustainable Housing' must include a condition that BEFORE any sites are granted planning consents an agreed and acceptable infrastructure plans must be in place.

We know transport is a real problem and we would welcome support from Transport For London (TFL) and transport providers to help alleviate some of our existing problems, in addition to supporting additional growth. It is important that all key parties work together to manage that growth, so Epping's unique character is protected.

Through our work on Neighbourhood Planning, Epping Town Council have gathered lots of evidence about what our residents want to see in Epping. We received an almost 15% response rate to our Household Questionnaire and that evidence should be taken into consideration whilst forming the Local Plan.

Epping Town Council fully appreciate that Epping Forest District Council must formulate a Local Plan to prevent government intervention and are pleased that consultation took place. We do feel, however, that six weeks was not a long enough period for people to respond to an enormous body of work that took years to develop.

There are sites in the draft Local Plan that Epping Town Council would not support for development. Sites, that with alterations and improved infrastructure carry possibilities and sites that would be more acceptable.

Residents have told us how important the Green Belt, green open spaces, health provision and sports and community facilities are to them and we have worked towards proposing solutions that retain, and where possible, improve these important things.

Part Two: Epping Town Council's general comments on the style of the draft Local Plan and Policies

This is a very aspirational Plan relying on support from Essex County Council's Highways, TFL, bus companies and the NHS for additional Doctors' surgeries, etc, that cannot be guaranteed.

A major criticism of the Plan is the fact that the Infrastructure Delivery Plan is not complete and the detail about how infrastructure will be delivered is missing or vague.

Epping Town Council would request that a clear framework is designed which will determine how infrastructure is delivered in conjunction with a site proposal. It is not acceptable to allow multiple small scale developments of 40 homes, for example, and then realise the collective impact has resulted in an irreversible problem. There should be clear and detailed guidance on how infrastructure will be delivered for every site allocation.

Much of the proposed development is ONLY SUSTAINABLE if the infrastructure is included. It is an absolute necessity that if the infrastructure is not provided sufficiently, the development should not go ahead. Sites may only be sustainable if the infrastructure is delivered at the same time. It should not be left to a S106 agreement or Community Infrastructure Levy (CIL) promise that the developer will contribute to something elsewhere at a later date. Infrastructure MUST be delivered at the time and within the local vicinity; it will be needed from day of occupation.

Draft Vision for the District is just that, it doesn't respect the individual character of the market town of Epping. Epping has not experienced the new homes of an appropriate mix of size, type and tenure, but instead what we don't need; more flats and the loss of bungalows. This must be addressed and the character of individual settlements taken into consideration, as national policy advocates and local policies aspire to. Neighbourhood Plans are therefore key and should be given the weight and support promised.

While it is difficult to argue with the flavour of the policies, there is not enough detail and it is what is missing that lets the Plan down. There is not enough detail about Epping especially considering the disproportionate allocation of homes and once again, the necessary weight must be given to the Neighbourhood Plan for Epping as it is designed for and by Epping Town councillors and the people who know the town.

There isn't enough complete evidence in the Plan to demonstrate that the level of development is sustainable. This is not properly defined in the Plan as the infrastructure delivery work is incomplete. To assume this level of development would have a neutral effect on infrastructure and biodiversity is nonsensical.

Strategic Policies

Policy SP4 Place Shaping:

The policy aspires to the best of town and country living, with a rich biodiversity of green space, development that enhances the natural environment, with strong local cultural, recreational and social facilities. The important features, character and assets of existing settlements should be maintained and enhanced; key landscapes, habitats and biodiversity should be conserved and enhanced.

Development on some of Epping's proposed sites would irreversibly damage what this policy seeks to protect and these sites should therefore be removed (detailed in Part Three).

Policy SP5 Green Belt and District Open Land

Epping Town Council would recommend SR-0071 is designated as District Open Land. It contains one of the original roads in Epping, was the site of a windmill, is vital to the landscape character of the area and should be joined up with the parcel of land known as Old Pastures to provide a natural passage for wildlife into the forest.

Given the importance of Green Belt to this District and our community, there should be the strongest possible policies on Green Belt.

Community facilities should be accommodated in the land already identified and further land should not be lost.

Green Belt is a constraint to development and which may restrain an authority in meeting its housing need (Planning Practice Guidance). This should be seriously considered.

Policy SP6 The Natural Environment, Landscape Character and Green Infrastructure

The policy aspires to conserve and enhance the character and appearance of the countryside, protecting the green assets in towns and settlements. Development on some

of Epping's proposed sites would irreversibly damage what this policy seeks to protect and the sites concerned should therefore be removed (detailed in Part Three).

District Wide Policies

Housing:

Draft Policy H1 Housing Mix and Accommodation Types

Epping Town Council strongly support Section E but request this is strengthened. Bungalows are proven to be an important part in Epping's dwelling mix and Council urge the policy to be strengthened and adhered to. Epping Town Council have fought constantly against the loss of bungalows as they are very needed in Epping and yet permission has constantly been granted by Epping Forest District Council or the Planning Inspectorate for their loss. This policy MUST be enforced.

Draft Policy H2 Affordable Housing

Affordable Housing should be considered on specific sites, rather than a proportion of all sites including a share of affordable housing. These different tenures are not always an appropriate mix. Affordable Housing should remain just that. It should stay in the care of a council or housing authority and not end up on the open market.

Employment:

Draft Policy E2 Centre Hierarchy/Retail Policy

Epping Town Council strongly support policies that protect the vitality of our High Street, our local businesses, our special charter market and the character of our town and conservation area. A town should be made up of a collective; residential, shops, businesses, services, recreation facilities, green spaces. Residences comprise the majority of the town. The High Street and Town Centre should remain just that, to support the population. Residential at ground floor in Primary Retail Frontage should be forbidden.

We have a small High Street and Town Centre and this space is needed for the economy and vitality of the town. Residential at ground floor in primary retail frontage is not sustainable.

Draft Policy E4 The Visitor Economy

The draft Local Plan supports the evidence showing the importance of tourism and the visitor economy for the vitality of the District. It fails, however, to show how this will be provided, when it is one of the areas easy to control.

Epping Town Council would support the conversion of the Police Station into a tourist information/heritage centre, with accommodation at first and second floors to help finance the development.

Draft Policy T1 Sustainable Transport

Transport is such a major issue in Epping. We are classed as a Town and benefit from being at the end of the Central Line, but our bus services are limited and congestion and parking are real problems and air quality suffers.

Whilst Epping Town Council support the concept of Sustainable Transport, the reality is somewhat different, as the deliverability relies on key stakeholders, partners and consultees. Whilst we assume all parties will attempt to work together on a cohesive strategy, there are no guarantees.

Epping Town Council would support the extension of the Oyster system to Harlow, for example, to ease pressures on commuters coming into Epping to use the Central Line and the associated parking problems, but is this deliverable? And will the cost be attractive enough to deter people from driving into Epping from other towns? It is essential that the key parties work together to relieve the congestion and parking problems that Epping is almost famous for. While managing congestion and providing consistent journey times is a real aspiration; how is it going to be achieved? (T1A)

People own cars and want and need to use them. Development that focuses solely around stations may promote a commuter town, where residents do not need to use the Town Centre/High Street, which would have an adverse effect on the town's economy. (T1B)

Development that does not come with adequate infrastructure will result in inappropriate traffic generation and/or compromised highway safety. It is therefore imperative, that if

development does not deliver adequate infrastructure provision, it SHOULD NOT be permitted. (T1C (iv))

Development will have a severe impact on the operation of the highways system if additional infrastructure is not put in place for developments as the town is already at capacity. (TC1 F (i))

Epping Council Town support F (iv) and request parking is given enormous priority in applications, both mitigating existing problems as well as addressing the issue through new development.

Habitats:

Draft Policy DM1 Habitat protection and improving biodiversity

Some of the proposed sites for Epping will not deliver net biodiversity gain, nor will natural habitats be protected, contrary to this policy.

Such policies should be strengthened to read MUST. Adjectives such as 'seek' are not policies, they are suggestions. Ambiguity in the current local plan has made it difficult to ensure intended policies are delivered in decision terms. A policy should be a strong policy, not a suggestion or aspiration.

Draft Policy DM2 Landscape Character and Ancient Landscapes

Some of the development sites proposed for Epping will cause significant harm to the landscape character. These sites should therefore be removed in accordance with the goals of the Plan (detailed in Part Three).

Draft Policy DM4 Suitable Accessible Natural Green Space and Corridors

This Policy seeks to protect Green Space. It is therefore necessary to remove some of Epping's proposed sites from the Plan.

Draft Policy DM5 Green Infrastructure Design of Development

This Policy seeks to retain and enhance green infrastructure, enhance trees and open spaces. Key green sites should therefore be removed from the Plan in accordance with this policy (detailed in Part Three).

Draft Policy DM6 Designated and undesignated open spaces

Remove site: SR0404 & 0405 Coopersale = site would remove the area's green spaces, which is contrary to the suite of 'Green' Policies proposed.

Heritage

The draft Local Plan Vision for Epping states:

Epping's Neighbourhood Planning evidence shows that the character of our market town should be protected.

Draft Policy DM7 Heritage Assets

Heritage Assets have already been proved to be significant by being included on a National List of protected buildings or a Local List of protected buildings, or by being protected under Conservation Area status.

Why should one applicant subjectively argue the significance of a heritage asset? It is on the list for a reason and these buildings and the three conservation areas in Epping Parish constitute an enormous part of the character of our town.

Heritage Assets should be strongly protected and that should include:

Conservation Areas

Nationally Listed Buildings

Locally Listed Buildings

Buildings which have a historical connection to the area

The settings of these areas and buildings must also be protected.

The draft Local Plan seeks to encourage proposals that conserve, regenerate, maintain and repair historic buildings (7Dii). This policy should be strengthened to ensure this is the case.

Basements:

Draft Policy DM12 Basements

Epping Town Council are pleased to see a policy which addresses a growing issue, basement developments. The rules on this should be strong and clear and proper protection given to neighbours and the ability of the building/area to cope with such development. One storey only as suggested.

Advertisements (businesses)

Draft Policy DM13 Advertisements

Epping Town Council have long fought for advertisements in the High Street and Conservation Area to be appropriate. There should be no illuminated signage in the Conservation Area, original shop fronts should be maintained and any external changes appropriate to the conservation area. Any lapses on this would damage the whole conservation area and its reasons for protection. This policy should be strong, clear and with no exceptions (irrespective of the size of the business and any chain branding).

Draft Policy DM21 Local environmental impacts, pollution and land contamination

The current traffic and congestion through Epping has local environmental impacts in terms of pollution. Any further traffic will exacerbate this and should be managed properly.

Part Three: Epping Town Council's view on the sites proposed for Epping and Coopersale (Epping Parish)

Please find detailed site comments below:

SECTION 1) ACCEPTABLE WITH INFRASTRUCTURE – RECOMMENDED A STRATEGIC MASTERPLAN FOR THE WHOLE AREA

(See Appendix 1a: Brook Road congestion) (See Appendix 1b: Green space)
(See Appendix 1c: Ivy Chimneys area) & (See Appendix 1d: Ivy Chimneys area 2) &
(See Appendix 1e: Ivy Chimneys parking)

The following sites would **ONLY** constitute sustainable development if the necessary infrastructure was added. Please therefore 'masterplan' the area as one.

SR-0069 Land at Ivy Chimneys Road (79 homes)

SR-0069/33 Land South of Epping (255 homes)

SR-0445 Greenacres, Ivy Chimneys Road (23 homes)

SR-0333Bi Epping SW area (24 homes)

SR-0113B Land South of Brook Road (244 homes)

Comments:

Epping Town Council accept development, but infrastructure is badly needed. This area suffers from extreme congestion and permitting development here **MUST** be accompanied by the necessary road infrastructure.

This location is a fairly long walk up a steep hill and as such, some distance from Epping High Street. There are no local facilities in this whole area apart from a small convenience store in Allnutts Road. Any development here should be supported by additional services such as a GP, school, local shops and improved access. The road network cannot cope with the existing population; it would certainly not cope with any more.

A new access road could run behind Ivy Chimneys Road, Bridge Hill and Brook Road to alleviate the existing problems here and support any additional development.

RECOMMENDATION: The proposal for this area is 625 homes. A strategic masterplan should be developed to ensure this level of development is accompanied by the necessary infrastructure needed, including a relief road, shopping facilities, GP surgery,

school, green space, etc. The masterplan should be developed by the necessary parties, with the input of Epping Town Council, as masterplans allow.

Sub total accepted: 625

SECTION 2) SITES CARRYING POSSIBILITIES

SR-0229 Epping London Underground station car park and land adjacent to Epping Station (89 homes)

(See Appendix 2 a-d: Epping Station).

Epping Town Council accept development but the existing parking must be maintained and improved. Consideration should be given to the number of floors and capacity underground. The visual impact on Epping and the surrounding neighbours must be considered.

Would parking here help the vibrancy of the town, as people park here and get on the tube, not visiting the Town Centre?

The current access is inadequate and another entrance/road to the station should be included.

Epping Town Council would request Epping Forest District Council work with TFL to explore the possibility of the tube being extended further up the line towards North Weald and Ongar as it used to be and also extending the 'Oyster' payment system to Harlow to deter outside commuters, which are a real pressure on parking in Epping. Appendix 2 shows a full station car park on a Sunday.

SR-0348 Cottis Lane (54 homes)

(See Appendix 3: Parking)

Epping Town Council accept development, but current parking must be replaced and more spaces provided. The design must be sympathetic to the character of the town and its neighbours. It is important that views over the town are not lost. Epping suffers from extreme parking problems and this should be alleviated by any development, not worsened. Appendix 3 shows a full car park on a Sunday.

Bakers Lane Toilets (in Cottis Lane car park) has the only public toilets in the town. This facility is an absolute necessity for Epping and must not be lost. If development took place here, where would the public toilets be relocated?

SR-0349 Bakers Lane (41 homes)

(See Appendix 4: Parking)

Accept development, but parking must be reprovided and more spaces than currently. The design must be sympathetic to the character of the town and its neighbours. It is important that views over the town are not lost, nor should lower lying properties be looked upon. Epping suffers from extreme parking problems and this should be alleviated by any development, not worsened. **Appendix 4** shows a full car park on a Sunday.

SR-0347 Epping Sports Centre, Nicholl Road (44 homes)

(See Appendix 5: Epping sports centre)

(See Appendix 6a: GPs, sports & community facilities)

Epping Town Council accept development here as this is a brownfield site, but improved sports provision must be provided IN EPPING itself. Where is the reprovided facility proposed to go?

Epping Town Council will happily work with Epping Forest District Council and other partners to help and support the delivery of sports provision in Epping itself.

SR-0555 St Margaret's Hospital site (181 homes)

(See Appendix 6a: GPs, sports & community facilities) & (6b: Hospital demand)

(See Appendix 7a & 7b & 7c: GP pressure Epping)

Epping Town Council accept some development (maybe older living accommodation) but keep core hospital facilities on site. Transport into town from there. Many older residents can't take multiple buses to other towns, so core facilities such as blood and other tests, should be available in Epping.

This site lends itself to mixed use; health facilities, residential, some car parking, some office space, which should be well served by public transport. Congestion hotspot close by at the Palmers Hill traffic lights, so any development must alleviate rather than worsen this.

SR-0556 Civic Offices, High Street (42 homes)
(See Appendix 8: Civic Offices)

Epping Town Council accept some development here, but it should respect the setting, conservation area and green and should not be high rise. The skyline from Epping Green and bungalows in Homefield Close should be protected.

Could this be mixed use? Offices and residential? Employment in town is desirable. Or site could be more suitable for new town centre hotel as part of the town centre/visitor economy - directly supporting Local Plan policies.

In accordance with draft Local Policy E4 The Visitor Economy

Enough parking should be made available to Epping Forest District Council staff, so as not to exacerbate Epping's parking problems.

SR-0587 Epping Sanitary Steam and Laundry Co, Ltd, Bower Vale (22 homes)

Epping Town Council accept some development here.

Mixed use to include residential, employment and parking. Access must be considered.
Sub total accepted 473:

Total: 1098

Plus suggested additions:

St John's Development – for 30 homes approx.

Police Station – retain building. Heritage centre/tourist info (as Local Plan advocates) on the ground floor. Flats upper floors – 6 approx.

In accordance with draft Local Policy E4 The Visitor Economy

GRAND TOTAL: 1134

SECTION 3: SITES THAT SHOULD BE REMOVED FROM THE LOCAL PLAN

SR-0071 Land at Stonards Hill (115 homes)

(See Appendix 9 Land at Kendal Avenue-Stonards Hill)

(See Appendix 11a Natural Environment evidence NP)

Remove from plan

Comments:

1) This is real countryside and green space. Access is by one private lane only.

Environmental issues – corridor used by wildlife into forest. Big badger sett, for example.

Huge diversity of wildlife.

Development of this site would be sprawl and encroachment into high quality countryside with loss of important wildlife habitats.

2) Vistas over Canary Wharf

EVIDENCE:

ARUP comments (Site Suitability Assessment Report):

Features and species in the site unlikely to be retained and the effects cannot be mitigated. Development would affect the whole BAP priority habitats.

This area is of high character sensitivity and development could detrimentally impact the open and semi-rural character of the area.

The protected trees are likely to have a significant adverse impact on the suitability of the site for development.

Allowing development here is contrary to national policies:

NPPF para 117, 118

Allowing development here is contrary to the following emerging draft Local Plan policies:

SP4 A (vi), (vii), (viii), (ix), (xi), (xii)

SP6 A, B (i), C (i)

DM2, DM5A (i).

SR-0132Ci Epping Sports Club, Lower Bury Lane (41 homes)
(See Appendix 10a Epping Sports Club, LBL)
(See Appendix 10b Lower Bury Lane traffic details 2005)
(See Appendix 10c Lower Bury Lane traffic flow details 2006)
(See Appendix 11a Natural Environment evidence NP)

Remove from plan

Comments:

1) Development here would be a dangerous precedent for further outward expansion into the open countryside / green belt on the western side of the town.

Fields

Creeds Farm to Cemetery = natural boundary of Epping

Vistas into Epping

Dangerous precedent

Swaines Green acted as a buffer zone, is this just moving development to the other side.

A development too far.

2) 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.

Sports Clubs

Loss of cricket/tennis & bowls = when further amenity loss when residents have told us sports facilities are very important

Not sustainable development

Loss of amenity

If the town is growing, we need more sports facilities **in the town**

3) 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.

4) The scale of the proposed development would be insufficient to deliver infrastructure.

EVIDENCE:

ARUP comments (Site Suitability Assessment Report):

Proposals are for higher density development than the neighbouring developments, therefore development is likely to affect the character of the area.

Site promoter proposes relocation of Epping Sports Club including cricket, bowls and tennis courts to the higher sensitivity part of the site. Why is this a suitable location then? In the same assessment, in combination effects from recreational pressures likely.

Therefore, why remove them? No sense in damaging the character of the landscape, just to provide them elsewhere in an area of higher character sensitivity, ie damaging the landscape twice.

EVIDENCE: Appendix 10b & 10c Traffic flow reports 2005 & 2006

Traffic was highlighted as an issue in this location in 2005. Traffic has increased enormously in the intervening 10 years and with additional school use.

Allowing development here is contrary to national policies:

NPPF 28; 70

Allowing development here is contrary to the following emerging draft Local Plan policies:

SP4: A (vi), (viii), (ix), (xi), (xii)

SP5

SP6 A, B, C (i)

DM2, DM5A, DM6C

SR-0208 Theydon Place (66 homes)

(See Appendix 12a & 12b Theydon Place)

(See Appendix 11a Natural Environment evidence NP)

Remove from plan

1) This land is part of Bell Common, a green playground with many walkers and a corridor site for local wildlife site. Development of this site would be sprawl and encroachment into high quality countryside with loss of important wildlife habitats.

2) The site is a long walk from the Tube station leading to increased car journeys, congestion and parking demand.

3) The scale of the proposed development would be insufficient to deliver infrastructure.

Part of Bell Common

Loss of vistas which stretch over to London. Wildlife. Bats. Green playground and local wildlife site/corridor for wildlife. Many dog walkers. Huge diversity of wildlife.

EVIDENCE:

ARUP comments (Site Suitability Assessment Report):

This area is of very high character sensitivity and the development could significantly alter the character of the settlement around this site. The protected trees would also have a significant adverse impact on the suitability of the site for development.

Allowing development here is contrary to national policies:

NPPF paras: 81, 109

Allowing development here is contrary to the following emerging draft Local Plan policies:

SP4: A (vi), (viii), (xi), (xii)

SP6: A, B, C (i)

DM2: A, DM5

SR-0404 Institute Road allotments

(See Appendix 11a Natural Environment evidence NP)

(See Appendix 11B Coopersale)

Remove from plan

1) Development of this site would be sprawl and encroachment into high quality, green belt, countryside.

2) Development of the site would represent the loss of a leisure facility, reducing the area's facilities while increasing the number of homes.

3) The site would have poor access to the main road system and a long walk from the Tube station leading to increased car journeys, congestion and parking demand.

4) Coopersale has insufficient services to support expansion, lacking the sustainability required within the National Planning Policy Framework.

5) The scale of the proposed development would be insufficient to deliver infrastructure.

&

SR-0405 Coopersale Cricket Club & CTG School Playing Fields

(See Appendix 11a Natural Environment evidence NP)

(See Appendix 11B Coopersale)

Remove from plan

1) Development of this site would be sprawl and encroachment into high quality, green belt, countryside.

2) Development of the site would represent the loss of a sporting facility, reducing the area's facilities while increasing the number of homes.

3) The site would have poor access to the main road system and a long walk from the Tube station leading to increased car journeys, congestion and parking demand.

4) Coopersale has insufficient services to support expansion, lacking the sustainability required within the National Planning Policy Framework.

5) The scale of the proposed development would be insufficient to deliver infrastructure.

EVIDENCE:

ARUP comments (Site Suitability Assessment Report):

Site constricted by Ancient Woodland. The proposals would likely result in direct loss or harm to Ancient Woodland which cannot be mitigated within the site.

This is playing fields, the primary school playing field and cricket ground. It is acknowledged as Coopersale's only open space and this would affect the character of the settlement.

Allowing development here is contrary to national policies:

NPPF paras: 73; 74

Allowing development here is contrary to the following emerging draft Local Plan policies:

SP4: A (vi), (vii), (viii), (ix)

SP6: A, C (i)

DM2, DM5, DM6B

SR-0153 Land north of Stewards Green Road (305 homes)

(See Appendix 13a Bower Hill view)

(See Appendix 13b Rear The Orchards view)

(See Appendix 13c Rear The Orchards 2 view)

Avoid losing this land; site not suitable.

- 1) Development of this site would be sprawl and encroachment into high quality countryside with loss of important wildlife habitats.
- 2) Development here would be a dangerous precedent for further outward expansion into the open countryside / green belt on the eastern side of the town.
- 3) The site is on rising ground, views over countryside with the Essex Way runs through it, prominent countryside with vistas over Canary Wharf.
- 4) The site would have poor access to the main road system.
- 5) Development would be detrimental to the occupiers of these properties backing onto the site.
- 6) This is the area with fewest community facilities but on a steep hill.
- 7) The Merry Fiddlers junction at Fiddlers Hamlet is already extremely dangerous and additional traffic through here would exacerbate this. Traffic lights or a roundabout would be needed.

EVIDENCE:

ARUP comments (Site Suitability Assessment Report):

In combination effects from recreational pressures likely

Medium sensitivity Green Belt parcel.

The protected trees are likely to have a significant adverse impact on the suitability of the site for development.

ARUP says site has connections to roads – not enough for 305 homes.

Part Four: Final comments

- 1) Parking displacement during construction works?
- 2) If car parks are developed, don't develop all car parks at the same time
- 3) Parking & congestion are already a real problem and that must be taken into consideration in the overall context of development
- 4) Epping Town Council would request very strong policies on parking, both on road and the need for adequate parking spaces for new developments. Council note that parking will be addressed through individual development proposals, but there must also be realistic provision for visitors. Parking on road must also be addressed with the relevant partners. Unless underground parking is possible and this will only be known after geological assessments on a site by site basis are undertaken, the number of units on a site may be reduced to accommodate sufficient parking. This should not result in extra numbers elsewhere. Our Neighbourhood Planning research shows that 52% of people in Epping drive to work evidences the importance of adequate parking for every new development. Epping is already beyond capacity with parking. This must not be exacerbated.

(See Appendix 14a: Parking & Congestion evidence)

- 5) Traffic and congestion already a major issue in Epping – 6 of the district 'hotspots' in Epping – how is it sustainable to add to this with no mention of road improvements?

(See Appendix 14b & 14c Transport issues)

- 6) Certain key documents not produced yet, eg transport and services.
 - 7) Evidence is not complete. Aspirational plan.
 - 8) Infrastructure must be provided to accompany development. How is it possible to accept or make decisions on these key areas, when the accompanying service and infrastructure plans are not in place? How do we know they will be delivered as promised?
 - 9) If community facilities are to be removed, they must be reproduced and enhanced to accommodate the additional numbers.
 - 10) Schools are already at capacity **(See Appendix 15a: Epping St John's capacity & See Appendix 15b: Epping Primary School capacity)**
 - 11) Look at density of development to preserve green belt
 - 12) Congestion during construction
- (See Appendix 14a: Parking & Congestion evidence)**
- 13) Vision = to boost the town. How can we do this without parking and just more residences?
 - 14) Too many houses, too much development, some site selection poor.

15) Draft Local Plan based on the sites that have come forward and not on sustainability which is at the core of the planning system. The sites that go forward should therefore reflect sustainable choices.

16) Development of many small sites may not give the necessary 'triggers' 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 road connections to the B1393 plus 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.

17) Epping Town Council identify many sites of particular road congestion and these include:

Junction: Palmers Hill and the roads either side of Epping Plain

Junction: High Road & Theydon Road/Ivy Chimneys Road

Brook Road/Bridge Hill

B1939 High Road to A121/B172 roundabout

Also: Very dangerous junction at Fiddlers Hamlet (opposite The Merry Fiddlers pub).

These need addressing now, before further development.

18) Wider strategic road congestion must be addressed which may include:

A414, B181, M11 & M25

19) There is already extreme pressure on the transport infrastructure between North Weald and Epping and delivering this level of development, even phased, without the adequate transport system will result in major issues and will have a seriously detrimental effect on Epping, North Weald, Thornwood and surrounding areas. This is not adequately addressed in the draft Local Plan.

20) Some of Epping's transport pressures are caused by people driving into Epping, parking and using the Central Line. Partnership working with TFL could address some of these issues.

21) Pressure on Epping Cemetery with such a proposed increase in population.

22) Residents want leisure facilities they can walk to. Locating leisure facilities in another town would further exacerbate the traffic problems whilst removing desired facilities, contrary to the requirements of the NPPF and Draft Local Plan policy D4 (iii).

23) Epping Town Council appreciate planning beyond the plan period, but to what level? The numbers proposed far exceed those required.

24) The draft Local Plan does not reflect the findings of the Issues and Options Consultation 2012, which has resulted in public unconfidence.

25) Epping Town Council's response has been written following Council meetings and meetings with our residents. We have tried to cover all the issues both Epping Town councillors and our community are concerned about, whilst appreciating the process.

26) Epping Town Council's Neighbourhood Planning Advisory Committee will return a response to the draft Local Plan consultation and will continue to work on developing the Neighbourhood Plan for Epping, with the detail needed for Epping.

27) Epping Town Council would appreciate a written response summarising the overall consultation response from Epping, in order to feedback to our residents.

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