

**Epping Forest District Council Submission version comments from Epping Town Council**  
**19-1-18**

With regard to Epping (town and parish), Epping Forest District Council's Submission Plan shows:

A 24% reduction in the number of homes since the consultation draft in 2016; 1311 reduced from 1690.

A Masterplan would be prepared for South Epping - to include a local centre, new primary school, new roads and a bridge over the railway, noise buffer along the M25, open space and strengthening the green belt margins of the site. This is absolutely key to the acceptability and Soundness of such development in this area.

The proposal at South Epping must be capable of delivering the infrastructure (particularly for transport) and the preparation and design of a Masterplan would enable vital local involvement to ensure key concerns are addressed. The details of this Masterplan and the correct input are crucial to the acceptability and Soundness of this large scale development. Epping suffers extreme pinch points already, particularly at Bell Common, the Plain and in through Epping High Street, which currently result in regular gridlock. The junction at Fiddler's Hamlet is also very dangerous and needs attention. Development would only be sustainable and acceptable with the necessary infrastructure.

However, the proposed increase in quantity within South Epping is a matter of considerable concern. Development of this area would need to reflect the characteristics which make Epping an attractive place to live. It is absolutely vital that the Masterplan and its promises are deliverable and delivered, particularly roads, in advance. A proper road across the railway line is needed.

The proposals in the Plan to review car parking requirements (lower levels within 400m of a transport hub, with the possibility of 'car-free' developments in some places) and relying on 'sustainable transport/self-containment/bus, walk and cycling to achieve a modal shift from car-use is unrealistic and inappropriate to address the existing concerns over congestion and parking in the town, nor a 'sound' approach to support new development in the town. It must be recognised that although Epping has good train links to London, the transport infrastructure travelling East, West or North is very limited or almost non-existent. Only approximately 26% of Epping's working population use the Central Line to commute to work. The car is still heavily relied upon and people use multiple cars. Car parking standards must be upheld and enhanced to reflect reality. The proposed policy to promote cycling as opposed to driving is not viable taking into account the topography of the area, ie Epping High Street is on a ridge and South Epping is considerably lower. For example, it is not viable to expect over 60 year olds or young couples with, say, 3 children under 10 years old to cycle up Bower Hill and Station Road. Cycling with weekly shopping is also not viable. There is no direct transport links to the nearest Hospital and this will be further exacerbated when the Hospital is moved to the west of Harlow. Epping Town Council would request a review of the whole transport network and infrastructure, where consideration is given to integrating main line stations into the TFL Oyster fare system to alleviate pressure on Epping. This would feed into the need for long-term and sustainable transport solutions.

The presence of the Underground station at Epping is inadequate justification for high

density development with low car parking provision and little extra road infrastructure in the town, and with little new employment proposed in the town, the new residents would travel to work, but without improved road connections and traffic management, would not be able to travel easily or effectively into other parts of Essex or East Hertfordshire, or into the London Stansted Cambridge growth corridor. Managing congestion and commuter parking around Epping Underground station is vital during any development, as this location is already under extreme pressure now. In terms of Highway Safety, the road bridge over the railway creates a dangerous junction and this must be addressed before any development.

The levels of road traffic and congestion makes reliance on walking and cycling as proposed by the Plan unrealistic without substantial alterations to existing highways such as the introduction of cycle-lanes, which in turn would reduce road capacity further and the topography of Epping and the area around makes cycling an unrealistic option for an ageing population or for younger people with young families,

New development requires suitable connections into the existing road network to minimise congestion (taking into account the points raised above) and provision of infrastructure must precede new homes.

The Submission Plan omits several sites around Epping shown in the 2016 consultation draft, which is very welcomed by Epping Town Council. The Town Council appreciate the removal of these sites, which were not acceptable for development. Epping Town Council must emphasise the importance of protecting the Green Belt, in accordance with national policy's ethos to ensure development now does not harm future generations. Trees meriting protection should receive protection to reflect their vital contribution.

Epping Town Council raises no issues in relation to the Duty to Co-operate or the legal compliance of the Plan. Furthermore, Epping Forest District Council have been very supportive of Epping Town Council's Neighbourhood Planning process and have liaised with the Town Council whilst developing the draft Local Plan, which has been appreciated.

The High Level Principles adopted as part of Epping Town Council's Neighbourhood Plan preparation seek amongst others, appropriate levels of growth in the town, that provision of infrastructure is key to the acceptability of development, existing problems of parking and congestion need to be addressed, and preserving the character of the town is a priority.

Housing stock must be appropriate. Epping is a mixed town with young people, families and elderly residents. Development should reflect this mixed use and only appropriate development would be welcome. This should include larger family homes, bungalows and retirement style living in appropriate locations, as well as flats. The density of development is also key to preserving Epping for future generations.

Development on car parks must be delivered in phases and appropriate mitigation measures taken whilst development takes place; such as a Park & Ride service. All building should be staggered appropriately across the Plan period, delivering the necessary infrastructure in advance.

Epping Town Council welcome the amendment which acknowledges the importance of

the library and its reprovision in Epping.

Whilst Epping Town Council do not oppose development on the sports centre site itself, it is key to the wellbeing of this large community that the sports centre is relocated in Epping itself.

**In conclusion:**

Epping Town Council welcome the sites that have been removed from the Submission version of Epping Forest District Council's draft Local Plan and stress the importance of protecting the Green Belt.

Whilst Council appreciate the concept of South Epping, they are concerned about the proposed quantity of approximately 950 homes and would request consideration is given to reducing this quantity. Development here would only be acceptable with a carefully designed and deliverable Masterplan which addresses the severe road issues at this location and provides the area with the key services they need, such as a suitable roads and transport infrastructure, a school, health hub, community facilities and green spaces. Consideration must also be given to the air quality and pollution, with appropriate tree screening for the motorway and greenery for residents, in terms of both pollution and noise. The density should be reduced to be able to deliver adequate parking provision in a town with severe parking issues, partly due to its position at the end of the TFL Central Line tube network. Parking provision must be realistic for all developments, particularly as the topography of the area makes walking and cycling difficult, especially in the southern part of Epping. The density must also be realistic and appropriate to the location. National policy promotes forward planning, which takes into account the effect current decisions make on future generations. These decisions are key to sustainability now and in the future.

Adequate infrastructure MUST be delivered BEFORE development. This is key to sustainable development in Epping. The layout of this historic market town with three conservation areas does not lend itself to mass development. There is one key route through the High Street which is already beyond capacity. There needs to be more assurance about infrastructure deliverables. Epping Town Council acknowledge the need for development, but it must be appropriate and deliver the vital infrastructure in advance. The deliverability of vital infrastructure such as roads is key to the sustainability of the whole area and if it is delivered correctly, in advance, in the right locations, would support the whole town and parish.

**Epping Town Council 19-1-18**