

EFDC Local Plan: MMs

From Epping Town Council

Issues & References

MM Number	Local Plan Policy Number	Issues	Comments
3	Page 3	N.Plans must follow local plan strategic policies	
5 and 15	Pages 8-10	Must deliver shortfall in affordable housing	
10	Table 2.3	Calculation of total new homes land supply	
15	SP2	Reduce new homes in Epping to 709	This is positive.
16	SP3	Schemes for 50+ homes review of masterplans	This is positive that more major development would be properly designed through Masterplans.
18	SP4	All districts to identify infrastructure to support growth (after para 2.118)	(p27) This is welcome. The needs of the District will change regularly as development takes place, not only with Local Plan developments but also smaller, cumulative sites. Growth must be supported by infrastructure to be sustainable. (p28) Welcome mixture of tenures. Towns/villages/parishes and communities need houses as well as flats. (p28) Welcome formal protection of heritage assets.
19 and 24	SP4	Green and blue infrastructure networks	(p29) Welcome addition regarding topography and landform and this should be a material consideration in approving development. Welcome addition for health and wellbeing and to ensure development is sustainable. Welcome addition to protect heritage assets. (p30) Transport connectivity in Epping should be improved to provide sustainable transport options and ease pressure on Epping Forest and air quality. The current transport network (buses) are not

			<p>sufficient, so this is a welcome addition.</p> <p>(p42)</p> <p>Will the planning system provide financial assistance to support existing green spaces that will be under extra pressure from development? Eg Parks and playgrounds. This is not clear.</p>
23	SP6	Green belt & Local Green Space	<p>These should be real protection to support sustainable development and communities. Development should not be deemed sustainable (2016-2033) without adequate and protected green belt and green space.</p> <p>(p42)</p> <p>Quality greenspace should be required not sought.</p>
24	SP7	Resist loss of specialist accommodation	<p>(p44)</p> <p>Bungalows (single storey) should be protected and provided for those not able to use stairs. Bungalows should be classified as single storey dwellings to support this sector of specialist accommodation, which is highlighted as a requirement of the Plan. Once a dwelling is two storey, it excludes a large proportion of those requiring specialist accommodation.</p>
28	H2	Affordable accommodation	
30	H3	Small village schemes providing affordable accommodation	<p>Still ambiguous. 'Not normally' is so vague. This needs some qualification.</p>
34	E1	Protect against loss of ground floor / change of use in town centres	<p>(p53) C)</p> <p>This should be qualified to exclude residential at ground floor level in primary and secondary retail frontages.</p> <p>(p55)</p> <p>This is most welcome. If not enforced it will destroy the vitality of the Town Centres.</p>
37	E3	Electric charging points in all new developments	<p>(p59)</p> <p>Normally be supported by a Travel Plan. Ambiguous.</p> <p>(p60)</p> <p>Parking requirements should continue to be reviewed on a case</p>

			by case basis. Developments are not a one size fits all.
41	T1	Cycling and walking networks Access to town centres and stations & good transport interchanges	These are all welcome additions. Cycling/walking/public transport/interchanges all vital to sustainable development including healthy communities.
41	Para 4.18	Limit traffic increases through Epping Forest Provide alternative spaces to reduce visits to Forest	This is most welcome. This is most welcome.
47	DM2	Developments to have no impact on Forest	This is most welcome. Must be delivered.
D		Local Green Spaces in Neighbourhood Plans and criteria	Welcome addition to protect the vital green spaces we already have to support sustainable development in terms of air quality/forest, habitats, etc.
53		Provision of open spaces	Welcome.
55	DM7	Protect heritage assets	(p80) This is welcome. Important to include both designated and non designated heritage assets. (p81) C) This should be an independent assessment by a heritage professional with the professional qualifications NOT a Council or developer appraisal. (p81) D) Needs clarification. This must be written to be clear that neglecting a heritage asset is not acceptable to gain development approval. (P82) G) Not strong enough support for heritage assets. Who will make the balanced judgement? Only a heritage professional should be able to do this. (P82) H) This could lead to damage to heritage assets. Compulsory purchase or similar should be built in to protect heritage assets, both designated and non-designated.
56	DM9	Part C – Quality Review Panel for 50+ homes	(p83) Positive.
		Part D residential extensions and alterations to respect original building	(p83) This is positive. This should be extended to protect ‘bungalow’ areas and any similar areas of specialist accommodation.

		Part G - connectivity, cycling and walking	(p83) Why must replaced with are expected to? They should.
59	DM12	Enhancing historic environment	(p85) Positive. (p86) B) Not normally. Ambiguous. Why change from will not? (p86) Not normally exceed the footprint of the original host building. Ambiguous. Large. Used to be 50%.
61	DM 14	Replacement shopfronts	(p86) Positive Conserve historic materials. Shopfronts should protect historic assets. What about internally illuminated signage? Should not be allowed in a conservation area.
64	DM16	SUDs	
66	DM17	New development 8m min from watercourses	
72	DM20	Masterplans to show either connection to decentralised energy network or low-carbon / renewable technologies	
73	DM21	Pre 1919 historic buildings	(p93) Very positive. Trying to use incompatible modern building materials can cause damage to historic buildings.
74	DM22	Air pollution and mitigation	
76		Coopersale defined as 'small village'	
77	P1	Epping – 709 new homes – 9 sites	
	P1	After 5.23 safe convenient walking / cycling / pblic transport routes to key destinations	
78	P1	Epp R1 & R2 – 450 homes Sports Centre – 42 St Johns - 34	
	Part C	Sustainable Transport	
	Part D	Infrastructure	(p104) Absolute requirement that infrastructure is delivered to serve new developments. New roads and services will be needed as developments are built and occupied and residents use services.

			Improved public transport is a must. (p105) Improvements and provision and green and blue infrastructure assets including open space. = How will improvements to current green spaces be delivered? This is not clear.
	Part G	Air quality and pollution mitigation	
	Part H	Pressure on Epping Forest	
	Part J	Masterplan (s. Epping)	(P106) This is now ambiguous. General conformity? Development must adhere to the Masterplan.
	Part K	Masterplan requirements	(p107) This is positive and an absolute requirement. GP. New school. Road infrastructure. What are 'appropriate' facilities? This gives no clarity. (p107) Positive including topography. (xv) Retention or reprovision of Brook Road informal recreation ground. This is an absolute requirement. There has been no consultation with Epping Town Council on this point. (They run Brook Road recreation ground.)
		Part L	Positive
		Map 5.1	Where is reduced S Epping numbers map? Not clear.
Chapter 6		Infrastructure Requirements	
MM105			(p166) Positive infrastructure keep up with development.
Part D			(p168) Planning obligations? CIL? S106? How will this work in practice/be delivered. This is not clear.
MM112	Review local plan	Every 5 years	(p172-P173) How involved will this process be? Very few details.