

## **Epping Forest District Council Draft Local Plan Main Modifications consultation July-September 2021**

### **Epping Town Council response**

#### **Part A: Introductory comments**

- Epping Town Council welcome the reduction of housing numbers and sites in Epping and welcome the confirmation of the Strategic Housing Market Assessment (SHMA) numbers in the District.
- The Town Council are committed to ensuring the vitality of Epping Town, High Street, Market and Parish, whilst retaining the character of the Town.
- The Town Council continues to request that development should be supported by the necessary infrastructure to support the town and make that development sustainable for the future. This is particularly so with regard to the 'South Epping' development (Policy P1).
- The Town Council recognises the effect of development on Epping Forest and the importance of protecting the Forest. This will require careful Suitable Alternative Natural Greenspace (SANG) planning to ensure that this can be achieved.
- The Town Council welcomes the acceptance of the importance of good design and designing spaces for healthy communities.
- All development must respect the three conservation areas, designated and non designated heritage assets and preserve the character of Epping Town and Parish.

#### **Part B: Specific comments**

##### **MM78: Policy P1: South Epping**

###### **Traffic**

- Concerns about traffic and congestion in Ivy Chimneys/Bridge Hill/Brook Road. Access for delivery vehicles.
- Main development in Epping will be South Epping, we need a local transport plan that encourages the use of public transport to and from the high street. Without one, parking and pollution problems will become more extreme.
- Removal of the proposed bridge scheme together with the cancellation of the Epping Station redevelopment proposals means that we face more congestion and parking issues.
- There is talk of a footbridge and linkage over the railway line but no clarity about a vehicular bridge.
- 950 to 450 welcome but what about the infrastructure? This is not clear.

## School

No information on school provision. New school in addition to Ivy Chimneys Primary School and is this definite? This is not clear.

Schools - the situation regarding the future of Ivy Chimneys school and increased provision for the influx of families means that firmer proposals are urgently required. This will need to include provision at secondary school level.

Does the education provision promised of a new school mean a completely new primary school or updated one? This is not clear.

## Green spaces

Loss of Brook Road playing field. It is well used.

There are several old trees on Brook Road which have Tree Protection Orders (TPOs) on them. We trust that these will be secure? This is not clear.

Recreation/green space has to be included. Reduced housing capacity, surely space for hill, lake, etc? This should be considered.

## Health provision

Healthcare - whilst the additional emphasis on health and wellbeing is welcomed, there needs to be additional provision for primary healthcare, especially for South Epping. It is clear that the current surgeries and doctors would not be able to cope.

What could the 'health facilities' proposed include? What are appropriate healthcare services? This isn't clear.

## MM78 Policy P1 South Epping: detailed comments

The Consultation on the Main Modifications cites the following:

(Page 107, Part K)

"K. In addition to the requirements set out above, the Strategic Masterplan ~~should~~ **must** make provision for:

1. (i) ~~a minimum of 950~~ **approximately 450** homes;
2. (ii) ~~a new neighbourhood centre to include~~ **appropriate** community **and health** facilities, employment and retail uses;

**What is appropriate? Will there be a GP or health hub? This isn't clear.**

3. (iii) **a new primary school** ~~and early years childcare provision (which could be accommodated through the relocation of Ivy Chimneys Primary School);~~

**Is this a new primary school in addition to Ivy Chimneys that will pick up the already oversubscribed primary school and additional dwelling children? This is not clear.**

4. ~~(iv) appropriate provision of health facilities, exploring the potential for a new health hub to include an integrated GP surgery, pharmacy and any other necessary health services;~~
5. (v) ~~new road access and internal road layout to support a bus corridor;~~ Provision or enhancement of walking and cycling facilities, Public Rights of Way and linkages both within the site, over the railway line, the footbridge over the M25, and to key destinations including Epping London Underground Station and the Town Centre;

(vi) ~~a new vehicular, pedestrian and cycling bridge over the railway line;~~ **Vehicular access/egress which provides safe access to the local highway network, does not impact on its safe and efficient operation, does not result in the loss of important boundary trees and/or hedgerows, or cause material harm to the living conditions of adjoining residents as a result of noise, light pollution or privacy.**

What will this vehicular access look like? It will be absolutely necessary to satisfy the criteria to avoid disruption to existing residents.

~~(vii) car clubs/car sharing or pooling arrangements, visitor parking and blue badge holders;~~

(viii) ~~minimising the impact upon~~ **preserving or enhancing** the setting of the Grade II listed Gardners Farm and Grade II listed Farm Buildings;

New point after (x):

"( ) the sloping topography of the site by incorporating sensitive design responses to the level changes and by ensuring a positive relationship is established between the new development, the town and the wider landscape;"

Remove point (xi):

~~(xi) careful design to avoid or reduce impacts on the ancient woodland which may include providing a buffer zone of semi natural habitat between built development and the Ancient Woodland;~~

Amend point (xii) as follows:

"(xii) the continued protection of those trees benefitting from a Tree Preservation Order and other identified Veteran trees;"

Amend point (xiv) as follows:

~~"(xiv) the integration, retention and improvements to the existing watercourse and Public Rights of Way, including the retention of the existing pedestrian footbridge over the M25, and enhanced linkages to Epping station;"~~

**Amend point (xv) as follows:**

~~“(xv) adequate levels of high quality public open space, including the replacement retention or reprovision of Brook Road Informal Recreation Ground; and”~~

**Remove (xvi) as follows:**

~~“(xvi) contribute towards air quality monitoring within the Epping Forest.”~~

**Additional point after (xvi) as follows:**

“( ) a Suitable Alternative Natural Greenspace.”

~~“. The Strategic Masterplan must incorporate measures to promote and encourage the use of sustainable methods of transportation and provide viable alternatives to single occupancy private car use including car clubs/car sharing or pooling arrangements. Such measures are to be planned in consultation with Essex County Council (and relevant passenger transport providers). The proposed measures should be underpinned by feasibility evidence that comprehensively demonstrates the delivery of modal shift by way of sustainable travel measures.”~~

~~“. Any application for planning permission made subsequent to the endorsed Strategic Masterplan should be accompanied by an assessment of potential air quality impacts demonstrating compliance with J. above, Policy DM2 and Policy DM22 and the Council’s adopted Air Pollution Mitigation Strategy. Such an assessment must take into account the results of monitoring in 2024/2025 which is to be undertaken in accordance with the Council’s adopted Air Pollution Mitigation Strategy. Accordingly no application for permission should be determined prior to such monitoring results being available.”~~

## **Part C: Other sites**

### **Housing in general**

#### **MM15 SP2, MM24 SP7, MM56 DM9**

Housing - whilst we welcome the reduction in the number of proposed dwellings, we really need greater clarity as to the provision of family homes (the Qualis schemes have been rightly criticised for the overprovision of one and two bedroom units), accommodation for the elderly and preservation of existing bungalow stocks.

### **Green spaces**

#### **MM78 Part H, MM56, MM53, MM41, MM23 SP6**

Green spaces - we need greater protection measures for local green spaces if we are to prevent the overuse of Epping Forest. How will this be achieved? This is not clear.

Improvements and provision of green and blue infrastructure assets should include Stonards Hill recreation ground, Lower Swaines recreation ground and others.

#### **MM19 SP4, MM23, MM24, MM25**

More details needed about green and blue infrastructure network.

In the post-Covid era, more people are expected to work from home. This will bring a need for greater emphasis on local green space and amenities. Any plan that projects forward to 2033 must surely address this fundamental shift in some way.

Green/Wildlife corridor: This is the strip of green space and wood stretching from Coopersale, Jack Silley playing fields, across Stonards Hill to the area South East of Theydon Grove through to east Epping and should be included.

The Main Modifications/Local Plan needs to get a really clear position around the issue of green infrastructure, local green space and SANGs so that it relieves pressure on Epping Forest (for example, the need for 'off-lead' dog-walking) and gives protection to open spaces in Epping.

Protection of green spaces needs to be built into Neighbourhood Plan and policies.

### Historical assets

#### **MM55 DM7, MM59 DM12, MM73 DM21**

The impact of any application on a historic asset and the justification and mitigation of any harm to non-designated historical assets is carried out by an independent professional and any heritage asset should not be permitted to deteriorate into further damage (P81).

What constitutes the 'substantial public benefits' which can be weighed against the substantial harm or loss of significance of a historical asset (p81)? This would also apply in terms of the public benefits under the 'Enabling Development' on page 82 and 176 that would enable the long-term conservation of a heritage asset.

Historical assets should be protected.

### Miscellaneous

#### **MM28**

There is discussion on page 46 of 'viability reviews' and 'clawback clauses' to guarantee enough affordable housing provision. What would this entail? This is not clear.

#### **MM46**

On page 72 it says that the need for a Clean Air Zone can be reviewed if improvements in air quality proceed quickly enough. Can this be amended to remove the need for a Clean Air Zone altogether if there are clear improvements in air quality? This is not clear.

### Infrastructure

An effective response on infrastructure requires EFDC and ECC to work together. There seems to be a disconnect between the Local Plan/Infrastructure/Main Modification and the Essex County Council capital programme and this must be connected.

### **Vagueness**

Many of the modifications are still so vague that they offer little reassurance. What we need is more consultation leading to concrete proposals.

### **Part D: Procedural comments: Main Modifications Consultation**

The Town Council have received numerous complaints about the inaccessibility of the Main Modifications Consultation. The documents total over 2700 documents and are not user friendly or accessible to the majority of residents. What about those without online access? This is not very accessible for those people.

Is not user friendly for residents, for many not understandable.