



# EPPING TOWN COUNCIL

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Date: 24<sup>th</sup> July 2024

Dear Chris and Meeting Place

## **Response from ETC to EFDC regarding the South Epping Masterplan: July 2024**

Having listened to the range of views expressed by individuals and organisations, Epping Town Council wishes to raise major concerns regarding the South Epping Masterplan.

**Epping Town Council wishes these concerns are addressed in a re-drafted Masterplan before the submission of any applications to EFDC for the sites at South Epping.**

**There is a very clear view that developers must provide the services, infrastructure and facilities which will make this housing scheme acceptable.**

The Town Council's major concerns are set out to address the following:

- The masterplan only covers matters within the site, it avoids the additional details which will be required to render the proposals acceptable of junction designs, traffic management and off-site services, infrastructure and facilities
- Problems regarding some design details of the proposed layout within the Masterplan are a major concern
- The provision of health facilities, bus services, and local convenience retail / takeaway opportunities within South Epping is central to reducing vehicle movements and pollution
- It is a major concern that serious highways issues – adjoining the site and nearby, traffic management, and mitigation measures are not part of the Masterplan (an explicit part of Neighbourhood Plan)
- the facilities and services shown on-site are inadequate and fall way below what is required for an acceptable sustainable urban extension
- The proposals need to contribute to the education needs arising from the development including secondary places and SEND facilities
- Future management of social housing, open spaces, recreation facilities, highways and street lighting, walkways and cycle-routes needs to be agreed as an early part of the Masterplan to provide reassurances to residents and future funding provision
- The lack of details concerning construction traffic proposals and impact mitigation measures is a major concern because of the potential detrimental impacts on residents, environment and traffic congestion
- A traffic assessment for the South Epping site should cover best and worse-case scenarios for levels of car usage / walking / cycling / public transport to ensure that if non-car options do not meet policy expectations the traffic impacts on the highway network and understood and planned for;

- The Masterplan should contain a commitment to a legal agreement between EFDC and developer(s) regarding facilities on-site and off-site, sequence of provision, levels of affordable housing provision, and other essential matters to make the proposals acceptable
- The Masterplan needs to highlight how the proposals avoid any Impact on important ecological and environmental habitats
- Major concerns that the condition of the highway along Ivy Chimneys Road, Bridge Hill and Brook Road is inadequate to take years of heavy construction traffic, including the water pipes beneath the road surface

These major concerns are derived from the range of comments raised at the various consultation events and meetings and framed within the context of the adopted Local Plan and emerging Neighbourhood Plan. Epping Town Council is aware of developers holding land and options to purchase on other sites around Epping. Failure to ensure proper provision of services, facilities and infrastructure at South Epping may become a precedent for other schemes.

Masterplan Concerns	
Only the red-line site	The masterplan only covers matters within the site, it avoids the additional details which will be required to render the proposals acceptable of junction designs, traffic management and off-site services, infrastructure and facilities
Number of dwellings	It is a concern that the Masterplan allows 'wriggle room' for a future increase in the number of dwellings above the 450 specified in the adopted Local Plan and emerging Neighbourhood Plan. At this stage there is an inadequate picture of the services, facilities and infrastructure to support 450 new dwellings let alone any additional
Layout too car-based?	The Design Code shows a fairly conventional car / street-based design approach with lots of details on whether car-parking is on-plot, on-street or in courts.
Local Services & Facilities	The provision of health facilities, bus services, and local convenience retail / takeaway opportunities within South Epping is central to serving new residents and reducing vehicle movements and pollution, and key to the concept of a sustainable development
New homes and screening	There needs to be adequate visual and acoustic screening for houses close to the motorway
	No screening is shown between new developments and some of the existing houses along Ivy Chimneys Rd
	The size, bulk, roof heights and design details need to reflect the local character
M25 Bund	The materials to construct the bund must be carefully monitored to avoid inappropriate or polluting matter being used, it should incorporate all on-site excavation material to minimise lorry movements
	Will the scheme also include noise attenuation beside the Central Line tracks?
SUDs	Ongoing management of the SUDs ponds and watercourses needs to be agreed to avoid future problems
	Features such as permeable hard surfaces within the development need to be maximised
Water management	There needs to be a robust water management plan covering the site run-off proposals, SUDs, water features and the impact on the

	brook across the site and how surface / foul water discharges are to be handled to avoid overloading existing drainage
	Proper and robust water management will be key in encouraging all wildlife that may live in, on and around the wet areas of the site
Water Safety	The extensive water features must be designed with safety in mind
BNG	The bio diversity net gain provisions must be central to the landscaping and habitat proposals within South Epping
Sustainability	There could be greater efforts to make dwellings more sustainable and 'future-proofed' e.g. grey water capture
Design of public spaces	Local residents and amenity groups in Epping should be involved at an early stage in the design of public spaces to ensure they reflect local character and needs – e.g. sports pitches rather than bland open spaces
Questionnaire	The raw data from the questionnaire responses should be made available in the interests of transparency over next steps
Highways, accessibility and movement	
Need an accurate and up to date traffic analysis	The existing traffic levels serving the dwellings, schools, golf course and other local 'movement generators' needs to be included in any assessment to ensure the new development does not exacerbate the current problems
	An updated traffic assessment of existing and proposed traffic levels and realistic capacity expectations for the Central Line, and local destinations (schools, town centre, health services) should be undertaken to guide decisions on what would be an acceptable pattern of accessibility, movement, cycle / walking facilities, road junction designs, traffic flows and traffic management measures .  The assessment should cover best and worse-case scenarios for levels of car usage / walking / cycling / public transport to ensure that if non-car options do not meet policy expectations the traffic impacts on the highway network and understood and planned for.
Lack of details on road junction designs / site access points	The lack of these at this stage in the development of the South Epping proposals is very concerning
Public transport	It is very concerning that the Masterplan shows no bus stops on site, no reference to a shuttle-bus service linking town centre, schools, hospital and South Epping,
Walking / cycling	The lack of any proposals for how cycle users and pedestrians will be able to safely use the site access junctions and joining highway network is very concerning: given that the adopted Local Plan emphasises the modal shift from cars to walking, cycling and public transport this aspect should be an integral part of the early urban design process and a key aspect of the Masterplan
	It is hard to see how walking / cycling will be successfully encouraged unless pavements / cycle routes in adjoining roads are enhanced
	The masterplan contains no analysis of major destinations outside the site (schools, services, town centre) to guide design and location of walkways / cycle routes

Modal shift	There is considerable scepticism among residents that cycling and walking will replace much of the anticipated car / road traffic due to the steep slopes on roads to the town centre.
Bridge over the railway	A bridge over the railway for vehicles would avoid adding to the traffic problems on Ivy Chimneys Road, Bridge Hill and Brook Road
Access for emergency vehicles, refuse vehicles etc	A bridge across the railway will aid access for refuse and emergency vehicles
Cycle parking	Cycle parking is described 'to minimum standards' – if cycling is to be encouraged as part of a modal shift from cars, this should be revised
Car Parking	If the development – sustainable, urban extension - is truly engaged in a modal shift away from cars and vehicles, the levels of car parking for the new homes needs to reflect this with more emphasis on cycle storage and less vehicle parking
	There is a risk that visitor parking at the SANG will be used for residents' vehicles
Footpaths	There should be signage to link the walking / cycling routes in South Epping with existing rights of way around the site
Impact of additional traffic on Ivy Chimneys / Brook Rd / Bridge Hill	These concerns were raised by many residents and are shared by ETC – the development should include measures to minimise the impact of additional traffic pm Ivy Chimneys Road, Bridge Hill and Brook Road with traffic management measures (improved signage / real-time info on hold-ups etc), single-direction flows, 20 mph speed limits adjoining the schools
	The additional road traffic with cars (plus the anticipated increase of cycles using the carriageways) will add to the congestion problems notably when there are hold-ups on the M11 / M25 and Epping acts as a 'cut-through'
	One mitigation measure would be the installation of a proper pavement (as per Manual For Streets) and road markings along Ivy Chimneys Road, Bridge Hill and Brook Road
	The lack of design details for the site access points is a major concern, especially in view of the difficult visibility at Fluxes Lane
	The Masterplan fails to show a direct route to connect traffic onto Theydon Rd / B1393
	The plans should include enhanced road-side parking opportunities where possible for residents on Ivy Chimneys Rd
<p>The site access junctions may need to be traffic-light controlled at peak hours to manage the flow or incorporate roundabouts (again with traffic lights at peak times), the design could incorporate speed restrictions, humps, narrows, priority lanes – all with the intention of managing the additional traffic flows and mitigating the impacts on the existing roads.</p> <p>Funded through s.106 contributions from the developers possibly with contributions from ECC and EFDC, the Neighbourhood Plan and Local Plan made it clear that the South Epping scheme would need to enable more walking and cycling to key destinations and greater use of public transport (which has a strong emphasis in the Local Plan) but would also need to address the motor traffic issues.</p>	
<b>Services &amp; Facilities</b>	
The Neighbourhood Plan is clear that the provision of services, facilities and infrastructure are key to making residential development acceptable	

Education	The proposed primary school should be required (through a legal agreement) as part of an early phase of development so new residents are not left without a school nearby and to avoid developer pressure to use the site for housing
	County Council should engage in a wider discussion of development pressures and timely provision of school places to avoid pupils being bussed out to Epping
	The proposals need to contribute to the education needs arising from the development including secondary places and SEND facilities as well as the primary school on-site
Health This concern was raised many times by residents	The lack of provision within South Epping for health services is a major concern given the difficulties encountered by existing residents in accessing these services without adding another 1,200+ people to the population
	The increased traffic may result in vehicles mounting the kerb and pavement near the current Ivy Chimneys school, plus the potential to damage property from impact, vibration etc
Additional Development	A major concern among residents is that additional development will be allowed either on South Epping (houses instead of the school), and on nearby sites, which should be resisted. If allowed however, there should be additional mitigation measures and traffic management over and above that required to support South Epping.
	The decision to strike the affordable housing element from the scheme rear of Civic Offices has stoked a view that no matter what the Masterplan for South Epping says now, pressure from the developers at a later stage will result in a reduction of the services, facilities, infrastructure and affordable housing
	There is considerable local scepticism that the 40% affordable housing shown in the Masterplan will be maintained

Construction Traffic	
Access	Construction traffic should avoid Ivy Chimneys Road, Bridge Hill and Brook Road to avoid affecting the amenities of local residents and avoid adding to the traffic congestion
	A separate access to the site should be negotiated and re-instatement after the construction period
	A vehicular access across the railway should be implemented for construction traffic to access both sides of South Epping and after building works remain for as a local distributor road / part of bus route
Timing / Traffic management	The movement of construction traffic should be detailed in a traffic management agreement, so that all construction traffic avoids existing peak traffic times
Impact on the environment	Construction traffic should be routed to avoid environmental impacts on sensitive environmental sites including Epping Forest.

s.106 agreement and sequencing	
	Masterplan avoids details or commitment to the infrastructure adjoining and near the site to make the scheme acceptable, these should be framed within a legal agreement at the earliest possible stage in the interests of transparency and delivery

	<p>Neighbourhood Plan Policy 5 describes residential development supported by infrastructure:</p> <p>a school, community facilities (with / adjunct to school??) and open space, a local centre with shop, takeaway etc., a GP / Pharmacy / health services, bus service(s) going into the site, recreation facilities for young teens (e.g. skate park)</p> <p>The provision of these services and facilities to support the development should be part of a legal agreements between the developers and EFDC along with contributions to services, the traffic management and mitigation measures and constraints on construction traffic access and egress routes and timing in order to render the scheme acceptable</p>
	<p>South Epping development should make a contribution towards secondary school places as well as the primary school on-site</p>
	<p>The legal agreement needs to set out the sequence in which these services and facilities are provided (typically after completion / occupation of XX dwellings)</p>

We also attach the Minutes from last week's Town Council's Extraordinary Meeting regarding the South Epping consultation which was held to discuss the consultation with residents for your information.

When it goes to planning application stage, could we request please for a six week consultation, rather than the usual three weeks as it is a big site; there will be many documents to consider.

Yours sincerely



**Beverley Rumsey**  
**Town Clerk & Responsible Financial Officer**  
**on behalf of Cllr Nigel Avey**  
**Chairman, Planning & General Purposes Committee**  
**Epping Town Council**

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