

Epping Forest District Council Representations to the Draft Local Plan Consultation 2016 (Regulation 18)

Stakeholder ID	3345	Name	Jon	Whitehouse	county council for Epping and Theydon Bois
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Method	Survey
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Date	
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Survey Response:

1. Do you agree with the overall vision that the Draft Plan sets out for Epping Forest District?

Agree

Please explain your choice in Question 1:

1. We AGREE that the draft vision set out in the green box in section 3.26 is an appropriate vision for the Epping Forest district and DISAGREE that the draft plan meets the vision. 2. The policies in the plan are not consistent with the "How we will achieve this" box in section 3.26 and in particular do not ensure that the provision of new homes will be met in the most sustainable locations. For example there is over-reliance on access to the Central Line as an indicator of sustainability to the exclusion of other factors. 3. Not all the draft plan objectives are carried through into policies, for example: a. OBJECTIVE D (Infrastructure and Movement) - the Infrastructure Delivery Plan included in the evidence base does not demonstrate that "the timely delivery of necessary infrastructure and services" can be delivered to support the development of the sites proposed and while it sets out some of the challenges it is particularly weak on demonstrating how the necessary transport, sports, leisure and health infrastructure will be delivered. For example there are currently long waits for GP appointments in Epping and Theydon Bois and the Theydon Bois branch surgery of The Limes opens only four mornings a week (and frequently one of these sessions is cancelled). This demonstrates that the provision of premises such as surgeries does not necessarily lead to the provision of the service intended to be provided from the premises. Overall the IDP does not achieve its stated purpose "to set out the infrastructure that will be required to deliver the planned level of housing and employment growth in the district to 2033". b. OBJECTIVE D (Infrastructure and Movement) supports "enhanced access to green spaces and leisure, play and sports facilities" yet the site allocations in the plan propose the development of publicly accessible green spaces both in urban areas (such as in Loughton) and in the Green Belt and the development of cricket pitches, playing fields and sports centres sites without even safeguarding land for replacement facilities.

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2. Do you agree with the overall vision that the Draft Plan sets out for Epping Forest District?

Disagree

Please explain your choice in Question 2:

4. We DISAGREE with the approach to the distribution of new housing. 5. Contrary to the premise of the question the draft Local Plan does not set out a full range of alternatives. The sustainability assessment makes this clear. In particular it has not looked at a proportionate distribution of new development between the principal settlements of the district (taking account of Green Belt and environmental constraints including flood risk and Epping Forest). 6. As a consequence the council's approach allocates a disproportionate and unsustainable level of development along a narrow M11 / Central Line corridor, particularly North Weald parish and Epping and within Epping to the south of Epping. This places excessive reliance on the Central Line and the road network around Epping and North Weald parish. 7. The allowance for windfall sites of 35 dwellings per year (section 3.55) appears unrealistically low. It seems likely that previously developed sites in the Green Belt which comply with the government's National Policy Planning Framework requirements will continue to come forward for residential redevelopment as will urban sites, especially in urban town centres and as a result of change of uses and mixed use redevelopments (e.g. at the former Junior School site in St John's Road, Epping). The allowance should be increased to a more realistic level and the number of dwellings required on new sites should be reduced accordingly. 8. We OBJECT to the distribution of sites as set out in Policy SP2 A (ii) for reasons set out above and more fully in our response to Question 6.

3. Do you agree with the proposals for development around Harlow?

Agree

Please explain your choice in Question 3:

9. We AGREE with using new development in and adjacent to Harlow to support the regeneration of the town and its function as a sub-regional centre, including as a location for employment and sub-regional services. 10. However as the draft plan acknowledges (section 3.67) there are transport and other concerns relating particularly to the proposed sites to the south and west of Harlow, which will place additional strain on Southern Way in Harlow, on the B1393 from Hastingwood via Thornwood to Epping (including the Palmers Hill / Thornwood Road / The Plain junction), on Epping High Street, Epping town centre and station parking and on the Central Line (which many residents of developments to the south and west of Harlow will use in preference to mainline services for reasons of cost). 11. With the exception of a passing reference to improvements to Junction 7 of the M11 in Policy SP3 D the plan does not demonstrate how these issues will be successfully addressed. The Memorandum of Understanding referred to in Policy SP3 B also fails to demonstrate how these issues can be successfully mitigated.

4. Do you agree with the proposed shopping area in...

Epping?

No

Buckhurst Hill?

(blank)

Loughton Broadway?

(blank)

Chipping Ongar?

(blank)

Loughton High Road?

(blank)

Waltham Abbey?

(blank)

Please explain your choice in Question 4:

12. Epping - The rationale for changing the High Street frontage opposite the Civic Centre to secondary frontage is unclear and the change is not adequately justified. It is more logical for this stretch to be part of the priority frontage in line with the rest of that side of Epping High Street and the High Street opposite. Page 214 of the draft local plan document says "Site visits in July 2016 reveal that this stretch of units includes multiple restaurants and a hotel". One restaurant is part of the hotel; there is one restaurant and one café. There are also at least 4 shops.

5. Do you agree with the proposals for new employment development?

Agree

Please explain your choice in Question 5:

13. We particularly support Policy E1 B (marketing requirements) in order to prevent the inappropriate redevelopment of viable employment sites and consequent negative impact on local jobs and services. 14. POLICY E1 E (renewal for some sites) appears to be an expression of view and not a policy. It should either set out more details or be moved to the commentary text. 15. POLICY E1 G. The final sentence should read "meet the needs of local businesses and / or attract inward investment". It is not necessary to require space to do both. 16. We note the statement in the Infrastructure Delivery Plan that "the high levels of out-commuting to London and destinations in Essex and Herts is a significant issue for infrastructure planning in the District" (page 7). The draft plan could more clearly support "reverse commuting" on the Central Line to town centre locations in order to support the vitality and viability of town centres and provide local employment. 17. We support the identification of EMP-11 and EM-13 as employment sites in Epping. These provided opportunities to work locally. Many former employment sites have been used for residential development and it's important that existing sites are maintained. There is a particular lack of medium warehouse premises of around 6- 10,000 sq feet.

6. Do you agree with the proposed sites in your area?

Epping (Draft Policy P 1):

Yes

Please provide reasons for your view on Epping:

Epping 18. We DISAGREE with the overall proposals. 19. The plan proposes very substantial additional growth for Epping, particularly to the south of the town, despite the fact that Epping was the fastest growing town in Epping Forest in the ten years prior to the start of the plan period (between 2001 and 2011) and the consequent pressures on local infrastructure. 20. As set out in the Infrastructure Delivery Plan, roads and junctions in Epping are already very congested causing long tailbacks coming into Epping from both ends at peak periods and at other times. Three of the six junctions in Epping Forest district identified in the Epping Local Plan Highway Impact Assessment (pp17-18) as "operating noticeably above capacity" are in Epping: •Thornwood Rd (B1393/B181) •Station Rd (B1393/Station Rd) •St John's (B1391/St Johns) 21. The proposed allocated sites will place increased pressure on these junctions, yet the plan states "Consultation with ECC has highlighted that there are limited options for local highways interventions within Epping and other key settlements within the district, partly due to the protected land in Epping Forest and the high risk of diverting traffic to residential areas". 22. Whilst we welcome encouragement of sustainable transport modes such as walking and cycling it must be recognised that a very large investment in additional cycling, walking and public transport infrastructure will be necessary to achieve substantial modal shift. Even then new development will generate a demand for car use which cannot be met by the existing road network. 23. We disagree with the statement that "ECC identified that walking facilities were of a reasonable standard throughout the district". ECC standards are unrealistically low and there is ample evidence of concern about the poor condition of many pavements, which can be a cause of falls which are not always reported to highways. 24. The potential for improvements to roads such as Brook Road, Ivy Chimneys and Bower Hill to increase capacity is very limited because of the constraints imposed by existing housing and the railway bridges. Commuting in cars to access Epping tube station has resulted in parking problems in the area. 25. The number of conversions of office space to residential in Epping High Street and the building of new flats, all without having a requirement for adequate parking, often none is required, will put additional cars on the roads to park so making the situation worse. All future residential developments in Epping High Street must include adequate provision for parking. 26. SR-0069 (land at Ivy Chimneys Road) / SR-0069/33 (land south of Epping) / SR0113B (land south of Brook Road) / SR-0153 (land north of Stewards Green Road) / SR-0338Bi (Epping south-west area) / SR-0445 (Greenacres, Ivy Chimneys Road) These sites have in common that they are remote from the High Street and other town centre facilities. The sites at Ivy Chimneys Road are also relatively remote from Epping station. Taken together they represent a grossly disproportionate allocation of new development to the south of Epping which will exacerbate the problems of congestion in the area and we therefore OPPOSE their allocation for residential development with the possible exception of development on the immediate south side of Ivy Chimneys Road itself which continues the existing pattern of homes and would sit opposite existing homes. They make a significant contribution to the Green Belt as evidenced by the Green Belt review. The only community facilities on this side of the railway line other than children's playgrounds are Ivy Chimneys School, Allnutts Institute, Allnutts Store and Theydon Garnon Scout HQ. The draft local plan and infrastructure delivery plan fail to demonstrate that the infrastructure needs of development on this scale can be met in this location. Even if a southern relief road is viable and deliverable (despite not being evidenced or mentioned in any of the supporting transport documents in the evidence base) it would need to rejoin the existing road network at Ivy Chimneys close to Theydon Road and at Brook Road / Stewards Green Road close to Bower Hill, placing additional strain on the Bell Motel junction and Bower Hill and likely to increase traffic along Stewards Green Road, Coopersale Street, Houblons Hill and Coopersale Common. Development on this scale (or even on a minority of sites) would also be likely to require provision of a new school and new community facilities including a community hall, playing fields, health facilities and allotments to make up part of the deficit of allotment land in Epping and especially on this side of town. Careful treatment of the environment would also be required particularly in light of the flood risk from the stream along Brook Road and the wildlife value of parts of the land. The plan and infrastructure delivery plan do not demonstrate that this is deliverable

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alongside the highways investment required. Development up the slope towards the motorway (particularly sites SR-0069/33 and SR-0113B) will be very visible in the landscape and any development near the motorway will be compromised by the need to take account of noise and air pollution. Site SR-0153 (land north of Stewards Green Road) is also very visible in the landscape especially from Theydon Bower and from Stewards Green Road approaching from Fiddlers Hamlet. 27.SR-0071 (land at Stonards Hill) This is more appropriately described as land behind Kendal Avenue. Although relatively convenient for the town centre and station compared to most other sites in Epping this is land in the Green Belt of high amenity, landscape and wildlife value with poor access and we therefore OPPOSE the site's allocation for residential redevelopment.

28.SR0132Ci (Epping Sports Club, Lower Bury Lane) We OPPOSE the loss of the cricket pitch and other sports facilities on this Green Belt site and OPPOSE the allocation of the site for residential redevelopment. This is a long-standing and highly valued sports facility (which is an appropriate use in the Green Belt). Relocation to an alternative less accessible site would undermine achievement of the objectives set out in the draft local plan or the infrastructure delivery plan as far as sports facilities and open green space are concerned. 29.SR-0208 (Theydon Place) This is a sensitive Green Belt site close to forest land, near the Bell Common Conservation area and part of which is a wildlife site. We OPPOSE its use for residential redevelopment. If residential redevelopment is permitted it should be limited to the front part of the site, include a buffer between development and the local wildlife site, and make provision for public access. 30.SR-0229 (Epping London Underground car park) We do not believe the Station Approach / Station Road / Bower Hill junction could cope with additional traffic generated on this site. Any residential redevelopment would need to investigate the feasibility of alternative means of access, probably from Centre Drive. If the access issue can be overcome, residential redevelopment of part of the site could be acceptable subject to sensitive design (especially in relation to properties in Sunnyside Road), no loss of parking space for station users and improvements to the environment outside Epping station including better separation between pedestrians, cyclists and vehicular traffic including buses, improved bus passenger facilities and provision for "kiss and ride" to reduce the volume of traffic waiting on Station Approach. 31.SR-0347 (Epping Sports Centre) Permission for residential redevelopment should only be granted if equivalent or improved replacement sports and leisure facilities are provided elsewhere in the town of Epping. Any residential redevelopment should relate well to the surrounding residential properties in Hemnall Street, Amesbury Close and Nicholl Road including respecting the scale of surrounding development. It should also have adequate parking, bearing in mind the parking restrictions present in surrounding roads. 32.SR-0348 / SR-0349 (Epping town centre car parks) The St John's Road / High Street junction has been identified as over-capacity and the draft local plan does not demonstrate how this constraint can be overcome. Subject to this, residential redevelopment of parts of the sites could be acceptable subject to sensitive design (especially in relation to properties in Buttercross Lane, Bakers Villas, Albany Court and St John's Road), no loss of parking space and taking any opportunity for town centre improvements benefiting. 33.SR-0555 (St Margaret's Hospital) We OPPOSE the loss of the healthcare facilities on this site, especially in the light of health services proposals to enhance the use of community facilities and the possible relocation of Princess Alexandra hospital to a location further away from Epping. Residential redevelopment of under-used parts of the site not required for future healthcare or education needs may be possible, for example adjacent to the Kings Wood estate. 34.SR-0556 (Civic Offices) The proximity of this site to the town centre means it is appropriate for mixed use development that supports the function of the town centre. This could include office use, hotel use or retail use as long as it was of a kind that supported rather than detracted from retail along the primary frontage as well as residential use on upper floors and / or

adjacent to existing residential streets. 35.SR-0587 (Epping Laundry) This site is suitable for residential redevelopment subject to compliance with relevant planning policies such as impact on residential amenity.

Loughton (Draft Policy P 2)

(blank)

Please provide reasons for your view on Loughton:

Waltham Abbey (Draft Policy P 3)

(blank)

Please provide reasons for your view on Waltham Abbey:

Chipping Ongar (Draft Policy P 4)

(blank)

Please provide reasons for your view on Chipping Ongar:

Buckhurst Hill (Draft Policy P 5)

(blank)

Please provide reasons for your view on Buckhurst Hill:

North Weald Bassett (Draft Policy P 6)

(blank)

Please provide reasons for your view on North Weald Bassett:

Chigwell (Draft Policy P 7)

(blank)

Please provide reasons for your view on North Weald Bassett:

Theydon Bois (Draft Policy P 8)

Yes

Please provide reasons for your view on Theydon Bois:

36. We disagree with the overall proposals. Taken together the proposals represent a disproportionate allocation of new development to a village with relatively few facilities and which experiences traffic, parking and infrastructure issues (notably the lack of an adequate GP service despite the availability of the surgery building) which the proposed new development would exacerbate. 37.SR-0026B / SR-0026C (land east of Central Line) We OPPOSE the residential redevelopment of this Green Belt land which would be highly visible in the landscape, breach the established settlement boundary which is the Central Line and which also provides a strong defensible Green Belt boundary. As the Green Belt review evidence shows, the land contributes to the purposes of the Green Belt The number of new dwellings proposed would significantly impact on the village particularly in terms of traffic. 38.SR-0070 (land at Forest Drive) This sensitive Green Belt site is immediately adjacent to the railway impact on the living conditions of residents especially at the density proposed. This field makes an important contribution to the overall character of the Green Belt and forest buffer land that lies between Theydon Bois and Epping. We therefore OPPOSE its residential redevelopment. 39. SR-0228i Limited residential redevelopment of part of the site could be acceptable subject to sensitive design, no loss of parking space for station user, adequate parking for residents and visitors and improvements to the environment for passengers. 40. SR-0228(ii) We OPPOSE the residential

redevelopment of this Green Belt land which would breach the established settlement boundary which is the Central Line and which also provides a strong defensible Green Belt boundary.

Roydon (Draft Policy P 9)

(blank)

Please provide reasons for your view on Roydon:

Nazeing (Draft Policy P 10)

(blank)

Please provide reasons for your view on Nazeing:

Thornwood (Draft Policy P 11)

(blank)

Please provide reasons for your view on Thornwood:

Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sewardstonbury, Sheering, Stapleford Abbots (Draft Policy P 12)

Yes

Please provide reasons for your view on Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sewardstonbury, Sheering, Stapleford Abbots:

41.SR-0149 (Tudor House) This is a Green Belt site where any development would be prominent in the landscape. We OPPOSE residential development unless carried out in line with the Village Design Statement / Neighbourhood Plan and in order to enable the provision of community facilities not already present in Thornwood Common. 42.SR-0404 (Institute Road allotments) Part of this site has already received planning permission for residential development. We OPPOSE the residential development of the remainder of the site in order to protect the allotments as the infrastructure delivery plan identifies a deficit of allotments in Coopersale. 43.SR-0405 (Coopersale Cricket Club and School Playing Fields) We OPPOSE the loss of the cricket pitch and other sports facilities on this Green Belt site and OPPOSE the allocation of the site for residential redevelopment. This is the only open green space in Coopersale apart from a small patch of land by the playground and there are no proposals for the relocation of the pitch within the village. The county council and governors of Coopersale and Theydon Garnon Primary School have confirmed that the playing fields are required for school purposes until at least 2033 and will not be available for development.

7. Do you agree with the approach to infrastructure provision being proposed in the plan?

(blank)

Please explain your choice in Question 7:

8. An Interim Sustainability Appraisal has been commissioned to support the Draft Local Plan. We would welcome any comments you may have on this.

9. Do you wish to comment on any other policies in the Draft Local Plan?

Policy SP5 GREEN BELT AND DISTRICT OPEN LAND

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44. The draft policy is weakened by the fact it mentions protecting the openness of the Green Belt but does not refer to the five purposes of including land in the Green Belt which are: a. to check the unrestricted sprawl of large built-up areas; b. to prevent neighbouring towns merging into one another; c. to assist in safeguarding the countryside from encroachment; d. to preserve the setting and special character of historic towns; and e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. 45. Section 4.97 refers to safeguarded land but not make clear how much will be required and whether this is to meet future development needs within the plan period (for example if allocated sites are undeliverable) or to meet future development needs beyond the plan period (in which case it should be out of scope of this plan. 46. It is also unclear whether the safeguarded land is to be found from the sites proposed for development in the draft plan or from sites not yet identified, and what if anything would trigger the development of safeguarded land in place of allocated sites. 47. The references to District Open Land are confusing and inconsistent both within the text and across the district. In particular there are many sites in other parts of the district that not proposed to become District Open Land even though they appear to meet the specified criteria better than the sites in Waltham Abbey that are proposed to become district open land. 48. If District Open Land has the same level of protection as Green Belt the implication is that development on District Open Land should be subject to the same policies as development in the Green Belt as set out in the NPPF (appropriate and inappropriate uses, very special circumstances, openness etc.). This should be made clear in Policy SP5.

Policy H1 HOUSING MIX AND ACCOMMODATION TYPES

49. We SUPPORT most of this policy. However a. Policy H1 A (v) (accessible and adaptable new homes) sets the lowest legally possible standard (compliance with Building Regulations). A proportion of housing should be required to meet higher standards in order to ensure a suitable supply of homes for the range of need in the local population. The plan should make reference to co-housing where older people buy or rent flats in a purpose built block with some communal facilities and organise it together and retirement villages large enough to provide various facilities and transport. The recent EFDC Ageing report stated 'Although there are only a few retirement villages across the country, they are gaining in popularity in the UK'. b. The intention of Policy H1 E (bungalows) is welcomed but fails to set out how the intention will be achieved. It is not clear how the policy conforms to the requirements of the NPPF and in what circumstances applications for the demolition of bungalows or conversion of bungalows into houses should be refused or permitted. It should be rewritten along the lines of: "The loss of bungalows will be resisted. Applications for the demolition of bungalows or conversion of bungalows into houses will be permitted only where the following criteria are met..."

Policy H2 AFFORDABLE HOUSING

50. We support in particular the requirement for viability evidence to be open and transparent (Policy H2 C). The policy should make clear this means viability evidence will be published for public inspection in the same way as other planning application documentation.

POLICY T1 (Sustainable Transport Choice)

51. POLICY T1 F (i). The implication of this policy is that development will be permitted if it has a significant adverse but less than severe impact on the highways network. The policy should be strengthened to make clear that development can be refused if it will have an impact which is substantially adverse and has a materially detrimental impact on other road users even if the impact is not severe.

POLICY T2 (Safeguarding of routes and facilities)

52. This policy would be strengthened if a list of the transport schemes referred to was included in the local plan and kept up to date.

POLICY DM 2 (Landscape Character and Ancient Landscapes)

53. This policy fails to make reference to the importance of protecting long views which contribute to the setting of historic towns and villages in the landscape (e.g. the views from the centre of Epping, which sits on

a ridge, to the fields and countryside on the slopes to the north and south of the town; or from the centre of Loughton to the forest).

POLICY DM 7 (Heritage Assets)

54.POLICY DM7 C (Registered Parks and Gardens) - this would read better if expressed as "Development...will only be permitted if (a) it does not harm...; or(b) can be fully justified..." 55.POLICY DM7 G (Enabling Development) - we support the detailed criteria which should reduce the possibility of abusing the concept of enabling development.

POLICY DM12 (Basement development)

56.We support the new policy on basement development.
