

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

Stakeholder ID 2544 Name Nicola Maher

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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?

**Strongly disagree**

Please explain your choice in Question 1:

I vehemently oppose any encroachment on Green Belt land. The Green Belt is vital to future generations, and it is entrusted to us to protect and maintain it. More creative solutions should be found. The 'Vision' in the Draft Local Plan seeks to protect the Green Belt, but the draft local plan fails to do this and will result in the loss of many clear and definable Green Belt boundaries. I consider the approach that the council has taken to be highly questionable. It seems to me that those most likely to do well out of the Local Plan are developers who will make substantial profit from building homes which will encourage inward migration from London. Members of the council might please their political masters by serving up the Green Belt on a plate, but this is not in the best interests of the local community. I also question the rationale behind the number of houses that apparently need to be procured.

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

**Strongly disagree**

Please explain your choice in Question 2:

New development should be around towns where brownfield sites already exist. We must protect rural environments, and preserve them for future generations. I believe that demand for housing has been significantly overstated. I am greatly concerned that land being considered for inclusion has come as a result of landowners offering rather than as a result of a cohesive consideration of the actual needs and capacity of the area. The Draft Local Plan states that the character of Theydon Bois should be retained and preserved. An increase in housing of 24% would destroy the character of the village, which has been in existence since the Domesday Book. Our elected officials should protect the communities they represent rather than sell them off to opportunistic landowners, using ill-thought out and short term thinking.

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

**Agree**

Please explain your choice in Question 3:

I agree it makes more sense to develop around existing towns, but am opposed to building on Green Belt land.

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

Epping?

**No opinion**

Buckhurst Hill?

**No opinion**

Loughton Broadway?

**No opinion**

Chipping Ongar?

**No opinion**

Loughton High Road?

**No opinion**

Waltham Abbey?

**No opinion**

Please explain your choice in Question 4:

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

Strongly disagree

Please explain your choice in Question 5:

New employment opportunities should be directed towards the sites where larger allocations of housing have been made. Preferably within or close to those towns in the District that wish to have employment opportunities expanded in a sustainable manner. While the restraints in 4.35 and draft policy E1B are to be welcomed as they help retain existing employment sites. It now appears 'short sighted' that a number of "employment sites" within towns have already been demolished in favour of more lucrative residential development. While the NPPF promotes the sustainable growth of all types of businesses, in rural areas employment other than appropriate agricultural or leisure related should not be allowed on sites within the Green Belt as this is unlikely to be sustainable development and does not meet with the tenets of the NPPF.

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

Epping (Draft Policy P 1):

**No opinion**

Please provide reasons for your view on Epping:

Loughton (Draft Policy P 2)

**No opinion**

Please provide reasons for your view on Loughton:

Waltham Abbey (Draft Policy P 3)

**No opinion**

Please provide reasons for your view on Waltham Abbey:

Chipping Ongar (Draft Policy P 4)

**No opinion**

Please provide reasons for your view on Chipping Ongar:

Buckhurst Hill (Draft Policy P 5)

**No opinion**

Please provide reasons for your view on Buckhurst Hill:

North Weald Bassett (Draft Policy P 6)

**No opinion**

Please provide reasons for your view on North Weald Bassett:

Chigwell (Draft Policy P 7)

**No opinion**

Please provide reasons for your view on North Weald Bassett:

Theydon Bois (Draft Policy P 8)

**No**

Please provide reasons for your view on Theydon Bois:

Theydon Bois is not being treated fairly by this second stage consultation. In the Issues and Options consultation document 3 sites A, B & C were proposed. These have all been rejected in favour of 5 entirely new housing sites plus an employment site in and around Theydon. Therefore Theydon residents will not be allowed a second opportunity to evaluate after the more detailed appraisal by the EFDC Forward Planning Team as there is no further consultation opportunity before the Plan goes forward to Section 19. This puts Theydon interest groups and residents at a considerable disadvantage in comparison to many of the other areas where residents will have had an opportunity to critique the councils later draft proposals for their area. Building within the village this should be in order to meet only local own Please note that Theydon has more than 30 new builds since April 2011 including some that are above 'Windfall'. At least 10 new completions are expected before the end of 2017, including 8 that are above 'Windfall'. These new builds are largely meeting our own needs. It makes me very angry to see that the character and way of life in my village is at risk of being sold off to the highest bidder. My family and I have lived here for generations. A 23% increase in the size of our village would breach the traditional limitations on Theydon's natural growth and far exceeds Theydon's own needs for housing. Present and foreseeable infrastructure for Theydon cannot support this amount of rapid and uncontrolled growth. A much clearer idea of Theydon Residents 'Vision' of our village and its future is contained in the Village Design Statement that was prepared with the guidance of the RCCE and is supported

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by the village wide questionnaire and other evidence.

<http://www.theydon.org.uk/VDS/VDS%20Downloads/TB%20Village%20Design%20Statement.pdf>

<http://www.theydon.org.uk/VDS/VDS%20Downloads/VDS%20addendum%20August%202015.pdf>

<http://www.theydon.org.uk/VDS/VDS%20Downloads/VDS%20Analysis%20Document%20PDF.pdf> Four of the proposed sites are in the Green Belt and these parts of the Green Belt have been identified as having a high or very high level of harm if allocated for housing. They are either not located within the 'main village envelope' and / or have clearly definable boundaries that should not be breached. Breaching these definable boundaries will result in encroachment into the countryside and a loss of the fundamental openness to these areas that are essential if the rural character of our village is to be maintained. The Draft Local Plan does not contain any very special circumstances for these sites that clearly outweigh this harm, and therefore our Green Belt boundaries should not be altered as part of this local plan. There is not the infrastructure to support the suggested increase in housing. Our plumbing dates back to the 19th century, and there are significant concerns about electricity and water. Our roads are already choked to bursting point with parking and traffic. The village can not support any more cars on the roads, no matter how much parking is provided. Specific Sites SR-0228ii Station Car Park and commercial yard to the East of the railway. I strongly object to any development on this Green Belt Land as it breaches the definable and defensible barrier of the railway line. Our argument with regard to all the developments to the East of the railway line SR-0228ii, SR-0026B & SR-0026C is set out below. SR-0026B I strongly object to any development on this Green Belt Land and it breaches the definable and defensible barrier of the railway line. Our argument with regard to all the developments to the East of the railway line SR-0228ii, SR-0026B & SR-0026C is set out below. SR-0026C I strongly object to any development on this Green Belt Land and it breaches the definable and defensible barrier of the railway line. Our argument with regard to all the developments to the East of the railway line SR-0228ii, SR-0026B & SR-0026C is set out below. SR-0070 Land at Forest Drive. I object to development on this Green Belt land unless very special circumstances can be shown. This is again a site within the Green Belt and is recognised as one of high value. The Sustainability Appraisal states the approach to the Green Belt sites will protect the most high value sites from development. Case Law has concluded that housing numbers alone are not classed as very special circumstance for development in the Green Belt. It is important that the alternative spatial option of "intensification within the existing settlement - (that) provides opportunities to maximise urban Brownfield land" should be considered first. The proposed 52 homes together with parking spaces is a very high density development for this site and I doubt that this density could be achieved with normal housing of an acceptable design. If development was allowed here it is crucially important that the clearly defined boundary within the Green Belt site of the Crystal Brook Watercourse is not breached and no development is allowed in the rising landscape beyond. The Theydon Bois tree wardens in conjunction with EFDC Country Care have identified 2 extremely rare Elm trees that appear resistant to Dutch Elm Disease on this site. These trees could be of national importance. They have discussed with EFDC's Tree Officers the possibilities of TPO orders on them. Such a high density development as proposed here could effect the viability of the important trees. If TPO's are granted this would reduce the available area for development I am concerned that as the only viable access to this site will be via Forest Drive and the multiple road junctions at Station Approach and Coppice Row that there would be severe traffic congestion and noise problems. Already there is congestion here. If a development was considered it should ideally be one of Sheltered, Assisted or Dependant Living homes that will have little or no parking requirement. This would allow space for a still high density but sympathetic design. This is a much needed facility within Theydon and the District given our aging population. Because of the desire and need for this type of special accommodation it may amount to 'special circumstances'. SR-0552 Blunts Farm Motorway Compound (Possible Employment Site). Given its remote Green Belt location and lack of public transport this site can only be accessed by vehicles using the protected Coopersale Lane. This is not a sustainable future employment site and can probably only be used for its present function were access is allowed from the motorway. My greatest concerns relate to the land to the east of the railway line and, if this is released from the Green Belt, the potential harm to the village now and in the future, particularly as there would no longer be a clear and well defined physical boundary to the Green Belt. I am vehemently opposed to any development on Green Belt land to the East of the Railway line. The three sites East of the railway line identified above and on Figure 5.17 of the plan document are: 1. SR-0026B (land East of Central Line/North of Abridge Road, including the Old Foresters Site)

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- approximately 133 homes; 2. SR-0026C (part of the Thrifts Hall Farm, Abridge Road) - approximately 121 homes; 3. SR-0228ii (Theydon Bois London Underground Car Park, and commercial yard adjacent to Theydon Bois Station, to east of Central Line) - approximately 19 homes. The NPPF states that "The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence." Paragraph 80 sets out the five purposes of the Green Belt which are: To check the unrestricted sprawl of large built up areas; "To prevent neighbouring towns merging into one another; To assist in safeguarding the countryside from encroachment; To preserve the setting and special character of historic towns; and To assist in urban regeneration, by encouraging the recycling of derelict and other urban land". Paragraph 83 is clear that a Green Belt boundary should only be altered in "exceptional circumstances, through the preparation or review of the Local Plan". It also states that such a review "should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period" Paragraph 85 sets out considerations for the local planning authority when defining boundaries and these include: They must "satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and define boundaries clearly, using physical features that are readily recognisable and likely to be permanent". Figure 5.17 of the plan document shows a quite specific somewhat curved 'dashed' outline to the East of the railway line that encompasses the three sites SR-0026B, SR-0026C & SR-0228ii. There are no clearly definable boundaries along this line. It is just a line across the field that has no justification. The next clearly definable boundary once the railway line is breached is the M11 motorway and that is a considerable distance further into the Green Belt. When the Forward Planning Team members were questioned regarding the reasoning behind this specific outline and justification for it as a proposed site boundary the only thing forthcoming was that it would allow the number of homes (273). It was further suggested that a definable boundary could be 'built' such as growing a hedge. To think this would form a definable and defensible boundary is frankly ludicrous. The Council has attempted to use very special circumstances to overcome the identifiable harm that would be caused to the Green Belt if these sites were developed. However, this has relied on weak planning judgment and they have been very general in their approach and not addressed the site specific circumstances of these sites. (See also our response to Q1) Therefore we consider that the stated very special circumstances do not clearly outweigh the significant and substantial harm that will be done to the Green Belt and will not preserve the special setting and character of our village. The Council's 'Vision for Theydon Bois' is that "Theydon Bois will continue to maintain its local feel and character and preserve its rural setting, adjacent to Epping Forest, while providing a mix of housing, key local services and high-quality independent retail. Theydon Bois will also enhance its leisure facilities and social infrastructure to support existing and future residents". It is clearly evident to us that if the proposals in the draft plan are adopted and 360 homes are built on the proposed sites then our rural setting will be destroyed and its present local feel and character will cease to exist. This 'Vision' will not be met.

Roydon (Draft Policy P 9)

**No opinion**

Please provide reasons for your view on Roydon:

Nazeing (Draft Policy P 10)

**No opinion**

Please provide reasons for your view on Nazeing:

Thornwood (Draft Policy P 11)

**No opinion**

Please provide reasons for your view on Thornwood:

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

**No opinion**

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

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

Strongly disagree

Please explain your choice in Question 7:

There does not appear to be any specific requirements for infrastructure, at best it is generalised and difficult to quantify as part of a new development. We would expect much more detailed assessments of the infrastructure needed at this stage, especially with regard to Q6 Theydon Bois, where we have been returned to 'stage one' as the original sites in Issues & Options' have all been rejected in favour of 5 entirely new sites. There are no provisions to ensure that the infrastructure needed will be provided in the right place at the right time. Without effective controls from the Council on the timing of housing delivery the infrastructure needs will not keep pace with housing development. The infrastructure requirements seem only to deal with the need arising from the new development and this in itself will do little to solve the existing problems and shortfalls. There is little about how the 'Community Infrastructure Levy (CIL)' will be implemented and how this can (or cannot) provide for the major infrastructure requirements to support the existing and expanding population. Secure funding, timing, capacity and specific types of required infrastructure should be assured before development is allowed to proceed. 1. Also An Interim Sustainability Appraisal has been commissioned to support the Draft Local Plan. We would welcome any comments you may have on this. (See Technical Document page). The Sustainability Appraisal recognises that the use of Green Belt sites would give rise to sustainability concerns. This is particularly the case for the villages around the District. The Sustainability Appraisal states the approach to the Green Belt sites will protect the most high value sites from development (and that is how those in Theydon Bois are rated), then contradicts itself by stating high quality Green Belt land will be lost (this would be true for Theydon Bois). The Sustainability Appraisal is correct to state that the loss of Green Belt land will have "significant negative effects", but gives too much weight to the no plan scenario claiming the land would be lost anyway. We therefore do not accept that high quality Green Belt land should be undermined by the Sustainability Appraisal, and indeed such high quality Green Belt land provides essential value that enhances the quality of lives within our district, now and into the future. The Interim Sustainability Appraisal does not support the wide dispersal of development in and around the large and small villages of the District. Such wide dispersal will perform badly with regard to sustainability as the large and small villages identified for housing development will still have to rely on the larger settlements for a wide range of facilities. In respect of Theydon Bois, the Sustainability Appraisal sets out the basis of assessing sites in the Green Belt "to enable sufficient sites to be considered to maximise existing sustainable transport links within the settlement". The transport links are already at capacity (we do not accept the ARUP opinion - See our Q6 Response) and our underground station is poorly served by the existing road network and bus services. New development designed and located to use the station will further add to the congestion and over-crowding already experienced around the station and on the trains and exacerbate Theydon's already difficult commuter parking problem.

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

While I accept that there is no need to repeat the guidance of the NPPF, the local plan is a strategic document that should be able to provide clarity, certainty and understanding to developers, residents and community groups alike through the inclusion of detailed development management policies. The draft policies are severely lacking in detail, for example Green Belt policies (SP5) amount to little more than a page. How do

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the Council intend to approach redevelopment of previously developed land in the Green Belt? How do the Council define disproportionate extensions to properties in the Green Belt, or direct what is meant by 'materially larger'. The Brentwood Draft Local Plan for example has been very specific on this; <http://www.brentwood.gov.uk/pdf/08022016165904u.pdf> (Page 140) The detail in the present EFDC Local Plan provides at least some better guidance than this draft and in the past this detail has allowed the Council and / or the Planning Inspectorate to better judge the appropriateness of any Planning Applications or Appeals before them. While draft policy (SP6) talks about "policy to manage and prevent harm to landscape character" it would benefit further from policies that seek to promote the excellent work carried out by EFDC Countrycare to improve and enhance the rural landscape and protected Green Belt land. We would like to see some specific reference to Quiet Lanes and Protected Lanes (such as Coopersale Lane) under this policy. Many of the important Landscape Character and Ancient Landscape policies (LL1, LL2 LL3) seem to have been lost. As noted in our responses above Theydon Bois and other places with or near stations have a considerable commuter parking problem. There is a lack of detail in Draft Policy T1 Sustainable Transport Choices policies on Car Park provision and retention and on residential areas and off street parking. What is required is a detailed and consistent approach from the Council at District level with greater clarity regarding such policies as those above or on design and the infrastructure. This should ensure that the local character of villages such as Theydon Bois is maintained or improved. We have viewed a number of other LPA's Local or Draft Local Plans and with respect to drafting new policies most have taken the NPPF as a starting point and gone on to provide greater detail and clarity with their own policies than those contained in EFDC's Draft Local Plan.

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