

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

Stakeholder ID 2471      Name      ian      Edwards

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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?

Please explain your choice in Question 1:

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

Please explain your choice in Question 2:

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

Please explain your choice in Question 3:

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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?

Please explain your choice in Question 5:

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

Epping (Draft Policy P 1):

No

Please provide reasons for your view on Epping:

Ian Edwards Evidence for Submission for Epping Forrest Draft Local Plan Summary of Evidence I wish to express concern with the Epping Forest Draft Local Plan (also referred to below as the 'Plan') and to ask the 'Plan' be changed to retain the areas of green belt in the town of Epping. The particular areas of most concern to me are marked on the 'Plan' (policy document SP2) as SR-0153, SR-0194, SR-0113B, SR-0113B, SR-0069, and SR0069/33. Evidence documented below shows, these sites are completely unsuitable for housing and development, SR-0153, SR-0194 in particular. 1.0The proposed allocation in Policy SP2 will lead to an exponential growth in the size of Epping. Epping (parish) currently has a population of 11,461 (2011 census) and a dwelling count of 5,312. An additional 1,640 dwellings will represent a 30% increase on the current dwelling stock in the town. The associated population growth, based on an occupancy of 2.5/dwelling, would be an additional 4,100 people, an increase of some 35%. This is disproportionate, given that it is one of the smallest settlements in Epping Forest. 1.01 It is acknowledged that the need to meet the projected population increase across the District represents an 'exceptional circumstance' which will require the removal of some sites from within the Green Belt, but it is my view of the evidence that the housing distribution and scale of allocation to Epping does not have regard to the town's constraints. Please note the National Planning Policy Framework (NPPF) Approach to Allocating Sites. In acknowledging the need to allocate sufficient land for development, the core planning principles contained in the NPPF require the following: "Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in the Framework." And "encourage the effective use of land by reusing land that has been previously developed (brownfield land)." (paragraph 17) 1.2

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Furthermore, in respect of plan making, the NPPF advises: "Crucially, Local Plans should... allocate sites to promote development and flexible use of land, bringing forward new land where necessary...and identify land where development would be inappropriate for instance because of its environmental or historic significance." (paragraph 157). 1.3 The NPPF advises that site selection should accord with the economic, social and environmental dimensions of sustainable development and that "Significant adverse impacts of any of these dimensions should be avoided" (paragraph 152). 1.4 In allocating sites for residential development, the Draft Local Plan has not had regard to the requirements of the NPPF and the need to adopt a sequential approach to the allocation of sites. It adopts an aggressive approach to the removal of sites from the Green Belt without having regard to the significant adverse impacts of doing so. 1.5 The subject site annotated as SR-0153, SR-0194 is proposed to be designated for new dwellings, including an element of affordable housing. It is one of a number of sites in Epping which is proposed to be removed from the Green Belt and allocated for housing in order to meet the allocation of 1,640 dwellings set by Policy SP2. 1.6 Based on the 'Plan' and on information provided by the site promoter I have significant concerns regarding the site's suitability for residential development. To reaffirm sites SR-0153 and SR-0194 proposed density housing concentration, relative to other Epping town sites are disproportionately high (against policy evidence provided by NPPF); and, further they and sites SR-0113B, SR-0113B, SR-0069, and SR0069/33 have also disproportionately high density housing concentration, relative to other sites outside of Epping town but within the whole geography considered by the Plan (against NPPF policy). 1.7 Site suitability: Environmental, Health and Safety and Infrastructure concern The Plan's Site Selection Methodology and Site Suitability Report has been reviewed with regard to the subject site. There many flaws and oversights. 1.8 The Plan proposal to increase housing in the SR-0113B, SR-0113B, SR-0069, and SR0069/33 and most disturbingly SR-0153 and SR-0194 sectors, which will suffer the worst due housing density proposals does not fully take into consideration the certain degradation of air quality and noise pollution; and, as a consequence, increased malign and potentially life threatening asthmatic and oncological affects upon residents, particularly the most vulnerable children (who walk along the adjacent roads to school) and the elderly. 1.81 This concern is shared with senior local (Epping) based education, transport, and health care professionals, scientists and other related professionals after considering (in the first instance) analysis of: the EU's recent findings of the illegal levels of air pollution in the region; coupled with both the high concentration of traffic in the M25/M11 region, and the prevailing wind from Central London. It was agreed by this group (of Epping professionals - list available on application to....Redacted....) any Plan to remove local green belt at the expense of increasing housing supply and new roads should necessitate a series of 'robust', and 'revised' independent environmental air and noise tests, funded by local government, and in concert with both UK Government (ie DEFRA and Dept. of Transport) and the EU; tests to take place throughout the year, especially during the summer months when local traffic emissions, and other pollution rates are at their highest levels. 1.82 Further the group mentioned the Department of Transport's figures (2012-15) large rise in diesel vehicle ownership, and fraud by many motor manufacturers in underreporting their true vehicle emissions - most notoriously by Volkswagen UK - and, the failure of central government to provide a system fit for the purpose of measuring new vehicle exhaust emissions in its testing facilities. 1.83 The High Court has now ruled for second time in 18 months that the government is not doing enough to combat the national air pollution crisis. "UK's air pollution crisis has been judged illegally poor at the high court, marking the second time in 18 months that ministers have lost in court on the issue. The defeat is a humiliation for ministers who by law must cut the illegal levels of nitrogen dioxide suffered by dozens of towns and cities in the "shortest possible time". Legal NGO ClientEarth, which brought the case, argued that current plans ignore many measures that could help achieve this, placing too much weight on costs. On Wednesday Mr Justice Garnham agreed. He also said ministers knew that over-optimistic pollution modelling was being used, based on flawed lab tests of diesel vehicles rather than actual emissions on the road." Source: The Guardian Wednesday 2 November 2016. 1.84. Further The 2014 Air Quality Progress Report (AQPR) for Epping Forest District Council In fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management Date (May, 2014) is not only prejudiced by the failure of government to accurately provide adequate systems to measure air quality; its original scope did not even attempt to measure all parts of Epping. 1.85 The AQPR only took measurements at four sites: Epping's Bell Common and three areas along Epping High Street, both of which are at much higher elevations, and further distant - in some instances by over 1km - from the lower elevations of sites SR-0113B, SR-0113B, SR-0069, SR0069/33, SR-0153 and SR-0194; sectors that importantly lie directly much closer to the M25 / M11 interchange and the highest concentration of emissions. Source: <https://....Redacted....>

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The AQPR is already three years out of date, and as per the evidence provided (above) pollution levels have both deteriorated; and the rate in which they are deteriorating is also increasing. 1.9 Transport congestion and lack of access for essential and emergency services Site SR-0153, SR-0194 are off Stewards Green Road, the crescent part of which is often blocked by parked traffic, and I have witnessed prevention of access to both Council refuse lorries and ambulances. Police accident blackspots, and severe congestion (during school run times) constantly blight roads on and between Brook Road, through Stewards Green Road to the Fiddlers Hamlet and beyond. Sites SR-0113B, SR-0113B, SR-0069, SR0069/33, SR-0153 and SR-0194 if developed will only mean an increase traffic, congestion, pollution, road accidents and health problems.

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 opinion**

Please provide reasons for your view on Theydon Bois:

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**

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

<http://...Redacted...>

## Response to the Draft Local Plan Consultation 2016 (Regulation 18)

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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:

See attached document <http://....Redacted....>

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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.

See attached document <http://....Redacted....>

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