

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

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Method	Email			
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Letter or Email Response:

E.F.D.C. Draft Local Plan Draft policy SP3 - proposed extensions of Katherines and Sumners. Paragraph 3.67 in Strategic allocations around Harlow states “sites to the west of Harlow offer greater suitability for growth into less sensitive landscapes. But the landscape character assessments commissioned by EFDC from Chris Blandford Associates dated 2010 for areas C 7 and C 8 define them as sensitive to high or moderate change. This opinion echoes statements from other professional planners over many years. At the time that Harlow’s eastern boundary was moved to incorporate more land, the inspector, on refusing a change to the western boundary, stated the MGB at Tylers Cross as “ being especially at risk in this vicinity in view of the conspicuously narrow gaps between Hoddesdon and Epping and Harlow”. The Proposed Changes to the draft revision to the RSS for the East of England in 2006 Policy HA1 proposed urban extensions to Harlow “to the north, east, and on a smaller scale to the south and west”. The conditions that gave rise to these opinions have not changed. The Chris Blandford LCA’s under Suggested Landscape Planning Guidelines include: ‘Conserve and enhance the landscape setting of Roydon Hamlet and Halls Green’ ‘Conserve the predominately rural character of this area’ ‘Ensure that any new development within the farmland is small scale, responding to historic settlement pattern and landscape setting’. Suggested Land Management Guidelines include: ‘Conserve and enhance the existing hedgerow pattern’. ‘Conserve designed historic landscapes’. Clearly the level of development proposed would totally negate these principles by making these areas the site for the estimated housing needs as the sole criterion. It seems that in this case the process started with the need to find space for a high number of houses rather than looking at planning potential by conducting a full feasibility assessment which respected existing features. This is not good planning practice. Perhaps a compromise could be achieved between the need for new houses and respect for the character of the land. Each area has a different character. The possible site for Sumners West is well defined. It is bound by the existing Sumners boundary, Water Lane and Epping Road. At the southern edge there is a field between a stream and the Epping Road which, if planted up, would make a defined green edge to Harlow. This field is in the South Roydon and Nazeing Conservation Area. Development here would have less impact on the surrounding landscape and the retention of existing veteran trees and good hedges would assist the transition from countryside to a built up area. By contrast the boundary of the possible site for the extension of Katherines is complex and the land has a variety of uses including housing, greenhouses and farmland. In addition, development would have a marked impact on the surrounding landscape. For these reasons the proposed development would be unacceptable. A smaller developed area along the existing boundary would be less intrusive. There are veteran trees to be respected and these include a row of native black poplars, part of Roydon’s nationally significant collection. We do not have the results of the Green Belt review but the purposes of the Green Belt as set out in the NPPF are crucial for these areas given their context. The

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LCA's quoted above, in Key Planning and Land Management, also high light the issue of 'Potential increases in volume of traffic on narrow rural lanes and road corridors, as threat to the rural character'. Traffic is a problem already within Harlow and elsewhere, particularly at rush hours. It is vital that the on-going studies of traffic be completed before the planning process progresses further. Forecasts of the effect of the vehicle movements resulting from growth should consider minor as well as major routes. Already there is concern over the effects of pollution from nitrous oxide on the trees in Epping Forest which are nationally significant.Redacted....