

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

Stakeholder ID	3483	Name	Camilo & Lisa	Vargas & Sullivan
Method	Letter			
Date	8/12/2016			

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### Letter or Email Response:

Dear Sir/Madam In response to the Epping Forest District consultation on the Draft Local Plan, we would like to submit the following comments as opposed to completing the questionnaire. We understand that, regardless of the format, the Epping Forest District Council has committed to review and duly consider all responses to the Draft Local Plan received by Monday 12th December 2016. In our opinion, the purpose behind the Draft Local Plan appears to be to provide additional housing largely for people who do not live in the District. The Draft Local Plan, as it stands, does not appear to be necessary to enable future generations to live near their roots or families, which is contrary to the 'vision', as we understood it from the exhibition held at Epping Hall on 11 November. Whilst the Draft Local Plan contains considerable detail on where EFDC proposes to build homes, it contains almost no information about where, when or who will fund additional infrastructure to support the existing and intended larger population. This is truly concerning, as in our experience, we have already had to wait around two months to see a local GP. We therefore find it unbelievable that ARUP, we understand to be the consulting engineers hired by the EFDC, can suggest that Limes Medical centre has capacity for almost a 50% increase in patients. We experience constant traffic issues like blind spots on roads such as Ivy Chimneys not designed to take the existing traffic or street parking, let alone any more traffic. We believe that longer delays or indeed traffic accidents seem likely outcomes of the current Draft Local Plan, as there is no clear outline for the infrastructure that would be required for each proposed development. Furthermore, we regularly find it difficult to get a car park when attempting to shop locally on the high street and increasingly experience packed Central Line tubes from Epping Station. It is worth noting that our reasonable forecast is that not only Epping's Central Line tubes, but also the local roads will be increasingly congested assuming even a small percentage of proposed sites in areas such as North Weal go ahead, as it is well known that residents in such areas travel to Epping to catch the Central Line. Therefore, additional population in communities other than Epping is likely to increase demand for capacity on the Central Line and for local parking. We are not reassured by lack of evidence and conflicting statements about capacity on the Epping branch of the Central Line. We understand that TfL has suggested to ARUP ( who have used this as the basis of their report to EFDC) that "the five stations at the end of the Central Line in Epping Forest District, peak hour capacity is around 37% utilised". As users of the Central Line, we find it incomprehensible to believe this statement regarding peak hour capacity and that the large increase in housing proposed would increase Central Line demand by only 3%. We request an independent review before any proposed development is confirmed, as it is only fair to the existing Epping commuters, many of whom rely on the Central Line to travel to and from work for their livelihoods. ARUP state "TfL have stated that there are capacity issues further down the line during peak times and discussions about the implications of growth in Epping Forest District are ongoing with TfL". This in our mind does not suggest that a current coherent plan for increased passenger demand is in place

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nor has a future plan been fully discussed and agreed, The Draft Local Plan does not include an infrastructure delivery plan and as such it should be separately consulted upon when it is available, prior to any further decisions on the proposed developments. There appears to be promises about infrastructure, but as already mentioned, no detail on where, in what quantity and at whose cost these elements will be provided. We find the ARUP assessment of existing provision completely unbelievable and ask that this be re-assessed and reviewed by another qualified entity. There is no statement about the location of additional infrastructure and we would like that it would be confirmed that none of such additional infrastructure encroach further into the green belt than the development sites consulted upon. We believe that Community Infrastructure Levies (CIL) impose additional costs on developers which are ultimately paid for by occupiers and as such caution should be used in setting its level, if at all. We also note that CIL does not have to be spent in the community where it arose and therefore we seek assurances that this has been duly considered. For examples, as already raised, additional development outside Epping could seriously impact our traffic, parking, etc. But CIL could be spent elsewhere. We propose that secure funding, timing, capacity and character of required infrastructure should be confirmed before any development can proceed. ARUP advise that "the forecast capacity figures show that current infrastructure will be under significant pressure to accommodate the growing population." We moved to this area to start a family in such an idyllic and community setting, but it appears that our future children may not even be able to be educated in the local school on the road which we live. If we are to have additional housing estates anywhere in the district, we believe they all should be given the care and infrastructure that appears to be proposed solely for near- Harlow sites. Therefore, the above-mentioned items need to be more thoroughly considered before any decisions as to where to build homes and how many homes can be accommodated should be made. Furthermore, we would like to be assured of the maximum (as opposed to the proposed) number of homes to be built over the next 17 years on each proposed site before any further consultations and decisions are made. EFDC proposals for some sites show numbers of home units that materially differ from the ARUP consultant's report. We are concerned that the ARUP appraisal might not be applicable to numbers different from those used in their report and that future development on these sites could be substantially above the indicated numbers. Without more detailed information we are unable to tell what densities are proposed and therefore whether precious land is being efficiently used. ARUP provide the proportion of sites to be flats but other categories (single person, affordable, etc) are not stated. We require this information to make an informed decision on each proposed development. In relation to the Council's consideration of a range of alternatives, it does not appear that additional housing is to be distributed among existing communities equitably. In our opinion, North Weald Bassett, Epping and Theydon Bois seems to have been allocated far more than a fair share. We would like to suggest alternative options such as a new town/ Garden village in the lower density parts of the district, increased density through redevelopment of less well build estates in the district or allocate the increase to within Harlow, as we believe that Harlow wished to become bigger. We would like to challenge whether sufficient effort has been made to site additional development "within existing settlements" and if any consideration has been given to the possibility to build many more homes on St Johns Road Epping. In addition, we would like to be sure that all land already sectioned off or marked as proposed developments is also considered as part of the Draft Plan before the consultation proceeds further. Language such as "release of Green Belt" is not how we would describe what we see as the destruction of Green Belt land and the use of such terms is insulting to the communities that live near the Green Belt. EFDC appears to have selected sites from proposals by land owners rather than objectively considering the merits of these areas as Green Belt and in our mind this is the wrong approach. For example, the sites near Harlow are part of our district and are Green Belt Land. Whilst these sites are not in Epping, we would not wish for Green Belt land to be destroyed. We note that development is intended on two local sports fields and the Epping sports centre. ARUP states "however, in all cases the existing facilities will be re-provided as part of development", which we find unlikely at the Epping Sports centre site, so as where? We would be most disappointed if additional Green Belt was to be used for this and it had not been fully consulted on prior to any developments proceeding. Our concern seems justified by ARUP's comment that unmet demand for school places may justify further building in the Green Belt, which suggests that loss of forest land seems very likely. Given the current Government's desire to reduce immigration and therefore the population, we would suggest that EFDC decline to submit a plan with so many homes, especially as the draft plan of 11,400 homes, largely in the Green Belt, conflicts with Ministers statements. If we are not brave enough to say no to such destruction of the Green Belt now, then where will it all end up for future generations. We would also like to see comprehensive environmental studies, preferably undertaken by more than one related specialist environment organization, for each proposed site, so that we all can make an informed decision as to what is best for our local community. In relation to any proposed shopping areas, several of the

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

proposed housing estates are so large and remote from existing shopping centres that they would need local shops. Whilst it is pleasing that "primary frontage" is addressed in the draft plan, we would like to see more robust design policies for the shop fronts and conservation areas. Policy DM 14 shopfronts and on street dining policies seem unambitious and DM 7 "Heritage Assets" Should be urgently reviewed to increase the local listing and these should specifically be identified in this policy as "Heritage Assets". In relation to DM 9 "High quality design", we suggest that the public should be able to give their views on any masterplans and to that end RFDC should form an advisory design panel. We understand that several " employment sites" have already been demolished in favour of residential development and that businesses near tube stations have been under pressure from plans to build homes where they operate(d), which seems inconsistent with stated policy. In addition, we challenge the ratio of affordable housing, as all the proposed developments would be above the threshold of 11 houses and 40% of the full 11,400 (4560 would be substantially more than the requirement stated (3,152) in figure 2.22. Finally we strongly suggest that there is a comprehensive assessment on the impact of local tourism, as in our opinion many visitors come to Epping to experience a pretty Market town and breathtaking scenery. Along Ivy Chimneys road, we fear that many of those trails will disappear and with it our social freedoms and local tourism. EDFC Cabinet minutes of 21 July 2016 report that the draft plan has cost almost £2 million so we are very disappointed that there are so many gaps in the analysis and proposals. Therefore we ask that the draft plan be reviewed and re-released, addressing all gaps, for comments prior to completing this consultation. Development of this site would involve the loss of cricket/tennis & bowls clubs when residents have told us sports facilities are very important. If the town is growing, we need more sports facilities in the town. The access down Lower Bury Lane is narrow and busy with school traffic. Not sustainable development.

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