

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

Stakeholder ID	4554	Name	D	Gillespie
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Date	11/12/2016
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### Letter or Email Response:

Dear Sir or Madam I write in response to your consultation exercise on the Draft Local Plan 2016. I would like to express my disappointment that such a short period of time for this consultation was allotted when the amount of information to be considered was considerable. I do not feel that the general public has had sufficient time to properly digest all that has been put forward and insufficient time to then seek legal advice thereon if desired. Further, the website for completing the consultation form was not working when I attempted to use it earlier, hence this email. Notwithstanding these obvious shortcomings in the procedure, I would respond as follows to the given 9 questions: Question 1. Do you agree with the overall vision that the Draft Local Plan sets out for Epping Forest District? (See paragraph 3.26, Chapter 3). No I do not agree. The 'vision' says it will protect the Green Belt, but the draft local plan does not do this at all and seeks to erase many clear and definable Green Belt boundaries. This is clearly contrary to the NPPF, Para 85. I cannot agree that the proposed 'total housing numbers' are accurate for a natural growth in population in this district. This number of new dwellings will simply encourage people to move here from London especially as developers will be quick to build and market the sites which will make them the most profit, such as those overlooking Green belt, in an attractive village such as Theydon Bois. The proposed sites are only in the local plan because they have been made available by landowners, and not because they are part of a clear and effective sustainable development strategy. There are no controls or conditions as to where, when and how the overall vision will be achieved. Developers will apply to build what is most profitable, not what is needed in the district. As always, this is the elephant in the room and EFDC cannot dictate what type of development will be built. Nowhere in this consultation have we been asked what type of housing do residents consider is needed in their immediate vicinity. Something of an oversight? I believe EFDC are on a mission to deliver the LSCC (I note no mention is made in the Local Plan of this project either) and to that end have no regard to what residents want. Therefore I believe EFDC are not acting transparently in the preparation of this Draft Local Plan and have spent taxpayers money employing consultants to deliver self-serving reports. 2. Do you agree with our approach to the distribution of new housing across Epping Forest District? (See Draft Policy SP 2, Chapter 3). No. The development proposed in the Green Belt have been badly conceived, and there is no apparent or detailed justification for a total of 360 new houses in and around Theydon Bois. Central Government and Epping Forest policy states that when considering changing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. This has not happened since the local plan seeks to locate housing and other development around each settlement in the District, regardless of size, supporting infrastructure (or the lack of it), open space, employment, shops, police and medical facilities etc. This cannot be considered right and nothing in the plan supports this new approach to development. It does not accord with current Central Government thinking. Any new development should be focussed on the towns in

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the District where they already benefit from good infrastructure and facilities and also have the space to provide additional associated development such as increased school capacity or larger doctor's surgeries. NB. In planning terms "Sustainable Development" is development that meets the needs of the present without compromising the ability of future generations to meet their own needs. 3. Do you agree with the proposals for development around Harlow? (See Draft Policy SP 3, Chapter 3). While I think it is more sustainable to focus development on towns, and not villages, any approach that encroaches into the Green Belt anywhere is not welcome and definitely not supported and is contrary to the NPPF. 4. For the two town centres and four district centres in the District the Draft Local Plan sets out a proposed primary shopping area which is intended to protect and encourage retail uses (See Draft Policy E 2 and Section 5 - Places). Do you agree with the proposed shopping areas? Creating primary shopping areas should help focus retail development in these areas, but the mix of retailers should be carefully considered as implementation could undermine existing local facilities found within the smaller settlements of the District and possibly push them out altogether. Primary shopping areas face strong competition from larger centres and the internet but the creation of such areas is undermined by the District's approach to housing and employment sites. The strategy of the local plan should support primary shopping areas by concentrating housing and employment development in the towns and settlements with this type of primary shopping areas. This will help protect and encourage retailer and shopping businesses in these new areas, thereby providing local and sustainable support for the shopping areas. Any primary shopping areas should be adequately serviced by transportation links to enable local people to access the areas with ease. 5. Do you agree with the proposals for new employment development? (See Draft Policy E 1, Chapter 4). No. New employment opportunities to be created should be directed towards the larger allocated sites near to and within the towns of the District. Alternatively, settlements which are keen to expand in a sustainable manner should be given the employment opportunities. Employment sites should not be left to be allocated "as appropriate" because the Green Belt constraints will limit the effectiveness of this with the likely result being that only the allocated housing sites will come forward. A strategic plan is needed and EFDC seem to have another agenda and not the one that will serve all residents fairly. 6. Do you agree with the proposed sites in your area? (See Chapter 5) Do not feel that you have to comment on all of the areas. Absolutely not. Four of the sites are in the existing 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. Reference to Planning Inspector decisions on previous applications on these sites should be relied on when considering these sites for development. They are neither located within the 'village envelope' nor have new clearly definable boundaries that would not be breached. This harm to the Green Belt will result in encroachment into the countryside by unsympathetic development and a loss of the fundamental openness to these areas as is prescribed by the NPPF. The Draft Local Plan does not contain or demonstrate any 'very special circumstances' that clearly outweigh this harm, therefore the Green Belt boundaries should not be altered as part of this local plan. It is also clear that the sites are only in the local plan because they have been made available by those that own the land, rather than being part of a clear and effective sustainable development strategy. They don't already have infrastructure problems. For example, the public transport is sparse and unreliable; the schools do not offer sufficient or any space into which to welcome new residents' children; the lack of adequate medical (doctors) provision is historic and well documented; the utility services of water and electricity are unable to fully cope now with the demands made upon them by the existing residents and the sewage system is woefully inadequate and frequently floods. Nothing is being done to bring any of these services up to date now so the thought of cramming more people into the system is ridiculous and irresponsible by EFDC. Despite nice theoretical words from TfL, there is no evidence that the underground service will indeed be able to cope with a large influx of passengers and certainly no undertaking to give comfort that proposals for increased service will actually be delivered has been demonstrated. 7. Do you agree with the approach to infrastructure provision being proposed in the plan? (See Chapter 6). No, not in the least. There are no specific requirements for infrastructure detailed in the Draft Plan, with most mentions being generalised and impossible to quantify for any particular new development. No guarantee is given that the infrastructure will indeed be provided in the right place at the right time. Once again, there will be inconvenience to existing residents until EFDC find the wherewithal, not to mention the funds, to deliver the necessary infrastructure. The infrastructure requirements only deal with the need arising from the new development and this in itself is unlikely to alleviate clearly already existing problems and shortfalls. It would be better to deal with the shortfalls first and consider expanding once you have proved you know what you are doing. 8. 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). Again, insufficient time has been given to study in detail all these documents. However, having studied them to the best of my ability I would say

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the Interim Sustainability Appraisal does not support the wide dispersal of development in and around the large and small villages of the District. With respect to Theydon Bois, the Sustainability Appraisal sets out that the basis of assessing sites in the Green Belt was "to enable sufficient sites to be considered to maximise existing sustainable transport links within the settlement". As has been said above, the rail transport links are already at capacity and the underground station is poorly served by the existing road and bus networks, such that any new development designed and located to use Theydon Bois station will further add to the congestion and over-crowding already experienced around the station on the roads and for parking and on the trains themselves. I do not agree that the wide dispersal of development sites will perform well with a range of sustainability objectives. This will only encourage residents to drive (unsustainable) to the stations putting pressure on capacity, roads and parking. Road improvements, maintenance and subsidies to TfL are not within the remit of EFDC but Essex County Council. Therefore, greater confirmation from ECC that these matters will be properly dealt with should be included in the Plan. The large and small villages identified for such development will still have to rely on the larger settlements for most necessary facilities. For example Theydon has no library, secondary school, full time doctor, NHS dentist or significant employment opportunities. Residents here have to use their cars or the tube to seek these facilities. A better choice of shops will always be available in the towns. Again, it all leads to greater dependence on cars, particularly in areas of poor or no bus services, and this will add further to congestion and further damage to the local roads and a dangerous increase in air pollution. Effective road maintenance is already beyond the resources of this Council and will greater use, the condition of the roads will only deteriorate. Will acceptable air pollution levels be exceeded? No evidence has been given to show air quality will be within an acceptable level and it is anticipated that with increased traffic it will not. The Sustainability Appraisal will also not help protect the strategic role of the Green Belt in these smaller settlements. The Sustainability Appraisal recognises the importance in making more efficient use of urban open space, with the primary benefit being fewer of the more sensitive sites in the Green Belt being required for development. 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, of which Theydon Bois is one. The Sustainability Appraisal states the approach to the Green Belt sites will protect the most high value sites from development. The document then contradicts itself by stating high quality Green Belt land will be lost. 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 which is not proven. Case Law has concluded that housing numbers alone are not classed as very special circumstances, and planning applications that breach all clear and well defined Green Belt boundaries should require a very strong case of very special circumstances, and even then permission for inappropriate development would be very unlikely to be forthcoming. It is therefore not accepted that high quality Green Belt land should be undermined by the Sustainability Appraisal, and indeed such high quality Green Belt land provides a strategic role that should be considered as showstoppers to any development. The Issues & Options document previously issued by EFDC stated that the natural growth of the district was some 200 people per year. Why then does this Council feel the need to accommodate 11,400? EFDC is being weak in not standing up to higher authorities (Government) who have issued edicts to provide this number of dwellings for unnatural growth and which will cause the 'urban sprawl' the Green Belt was designed to prevent. To allow Green Belt to be reduced and released for development in this district is to betray its residents who have cherished the district thus far. As a tax paying resident of this district, I would urge EFDC to stand by the NPPF and protect the Green Belt of Epping Forest District. 9. Do you wish to comment on any other policies in the Draft Local Plan? It is accepted that the local plan is a strategic document but it still needs to be able to provide certainty and understanding to developers, residents and community groups alike through the inclusion of more detailed development management policies and Green Belt protection policies and to give greater weight to Neighbourhood Plans. The policies are woefully and severely lacking for example, there are no detailed Green Belt policies such as to define disproportionate householder extensions in the Green Belt, or direct what is meant by 'materially larger' or policies surrounding basement construction or strict parking requirements. There are no policies which enable residents to have their say on applications and influence what gets built where. How do we approach redevelopment of previously developed land in the Green Belt? This all requires a consistent approach to be set at District level and not left to emerging guidance or even Neighbourhood plans. Apart from any lack of guidance, it leaves the system open to corruption. The design and infrastructure policies are very general and not specific. There is no confidence that the allocated sites will take on board and respect the local character of Theydon Bois, particularly as much of the allocated sites are separated by a railway and its embankment such that there are very few visual linkages between the proposed sites and the existing

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village. The idea does nothing to promote community cohesion. How will you stop planning applications for the new housing coming forward before a masterplan has been produced for the site? Parking provision is not mentioned in the detailed policies of the local plan which appears to be a gross oversight. Asking developers to contribute to road schemes or infrastructure delivery is one thing, but who is going to maintain those roads and infrastructure once the developers have moved to their next job? EFDC cannot sustain the infrastructure we have now to an acceptable level with cut-backs everywhere, insufficient police to keep residents protected, insufficient medical facilities for all, transportation difficulties on road and rail and scandalous provision for the elderly. The district will be overloaded and society will break down as it is breaking down now. The district will lose its historic identity and become another ghetto suburb of London, especially when TfL introduce 24 hour tube service bringing the...Redacted... To even consider imposing this level of development on Theydon Bois is to indicate that there is little interest in maintaining the ambience of the area which is already under threat from the neglect of the past decade. Please don't let any of that happen by allowing development in or a reduction of our Green Belt. Heed Ministers' statements when they say they wish to protect English Green Belts. Kindly acknowledge safe receipt of this email. Yours faithfully  
...Redacted...