

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

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Letter or Email Response:

This is my response to the Draft Local Plan Consultation. I have tried to respond to the set questions but the 'ticked box' approach can be restrictive when considering the complex issues covered by the questionnaire. We are repeatedly being told that the Draft Local Plan for Epping Forest is 'Our Local Plan' but the reality is very different. The No 1 priority for residents of Epping Forest District is the Protection of the Green Belt. This was made clear in earlier consultations. Yet we are facing approximately 80% of the proposed new homes being built on Green Belt sites. This is contrary to Government Policy, Planning Practice Guidance and repeated Government statements. We are told that only 1.5% (or other similar amounts) of our Green Belt will be given up to housing but when I look at the map of proposed sites around Theydon Bois and the proposed housing levels (and I am sure this applies to other parts of the District) it is clear that we face a greater than 20% increase to the size of our village which would destroy the present character of Theydon Bois in addition to losing a substantial and vital part of our surrounding Green Belt. We are being told that we need to build homes for our children and grandchildren. The growth rate within the District (stated as 200 per annum in the Issues and Options Consultation) does not justify 11,400 new homes. It is trying to accommodate the migration levels from London and planned growth of Harlow which is driving the figure to such an unacceptable level. The 'wants' of people to move into the District should not be translated into housing 'need' for Epping Forest District. The figure of 11,400 is not the housing need of the District. It is also quite clear that any new homes in or around Theydon Bois will be at premium prices which will be financially inaccessible to young people who are growing up in Theydon Bois. For example, a new one bedroom flat on the development of the former Darlington's garage site in Coppice Row was marketed, I believe, at £475,000. I understand that offers were made in excess of this amount! These properties are bought up by others moving into the District who have the money to pay to live in them or to rent them out. The Local Plan is not 'Our Local Plan' The Local Plan is not going to provide new homes for our children and grandchildren. Q1 - The Vision - Strongly Disagree Whilst many aspects of the Vision appear to be admirable, they are not borne out or supported in the detail in other Chapters of the Draft Plan and are unachievable. For example, the Vision proposes to protect the Green Belt, but only after giving up large areas of Green Belt around settlements for the development of new homes. This is not protecting the Green Belt. Much of the vision for housing is dominated by focussing on the expansion of Harlow and supporting the Harlow-Stansted-Cambridge corridor. This will place an unacceptable burden on Epping Forest District and its Green Belt if it goes ahead in its present form. The Vision for infrastructure is very weak and mostly generalised statements. I consider the Vision to be unsustainable as there is too much concentration on building new homes and it contains very little detail about how the substantial amounts of new infrastructure can be achieved. The current infrastructure - transport links, GP and health services, schools etc is already under pressure and, in many cases, failing the existing population. Q2 -

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Proposed distribution of new housing - Strongly Disagree Local Plans are intended to promote sustainable patterns of development. The sites put forward for housing appear to be distributed across the District, in and around smaller settlements as well as the towns, irrespective of whether their is, or likely to be, sufficient infrastructure to serve them. There is no detailed justification for the numbers of homes proposed or how these homes will be supported in terms of employment and other facilities. This is certainly the case with Theydon Bois. Simply being close to a tube station, where the trains are already running at capacity in the rush hour, and with virtually no local employment options, does not make for a sustainable location. In many cases it appears to be a case of taking up landowners' offers, who put their land forward on the Call for Sites, rather than a strategic approach to the most sustainable locations. It is only in and around the larger towns that adequate infrastructure can be provided or as part of a comprehensively planned new settlement beyond the Green Belt as set out in Paragraph 84 of the NPPF. I read with interest a recent article (30th November 2016) on Braintree District Council's website about a joint vision with Essex County Council, Colchester Borough Council and Tendring District Council to plan for 3 new Garden Communities in the North of the County. The Leader of Braintree District Council is quoted as saying "New communities built with visionary and ambitious garden community principles will mean holistically planned homes built with the timely delivery of infrastructure which we believe is much better than hundreds of smaller developments dotted around the District. We firmly believe that garden communities are considered the best way to deliver large scale new infrastructure". He also says that these new communities will not swallow up existing communities which is what will happen to a relatively small community like Theydon Bois. This does seem like joined-up thinking and would more likely ensure that the necessary infrastructure was developed alongside the new garden community developments.

Q3 - Proposed development around Harlow - Disagree I cannot support the proposals to build new homes on Epping Forest District's Green Belt land to the south of Harlow. If Harlow wants growth, more homes could be incorporated into the regeneration of the town itself in better designed, higher density developments and in other locations (a new garden village?) which would more directly benefit from the proposed new M11 junction to the N.E of Harlow. I understand that EFDC along with Harlow and East Herts are applying for Government funding relating to garden towns/villages. I strongly disagree that a new Harlow 'garden village' should include Epping Forest District's Green Belt land to the south of Harlow.

Q5 - Proposed new employment development - Disagree New employment sites are only appropriate and likely to be sustainable in, or close to, the towns and larger settlements. The site proposed for Theydon Bois SR-0552 is in the Green Belt and remote from Theydon Bois and any transport links. It is situated adjacent to the Historical and Protected Coopers Lane. There is no safe walking route to the site and any journeys to and from the site would have to be by car which would be detrimental to the Protected Lane. It is a most unsustainable location for employment opportunities and is currently used as a Highways maintenance compound. The methodology relating to this site's selection includes some misleading and occasionally bizarre criteria scores, presumably due to the consultant's lack of any real knowledge or understanding of the area.

Q6 - Proposed sites for housing - Theydon Bois - Strongly Disagree Of the 5 sites put forward for housing development, 4 are situated in the Green Belt. I strongly disagree to the proposed development of 325 new homes (92% of the total allocated for Theydon Bois) on the Green Belt fields around Theydon Bois village and, particularly, the proposed breaching of the clearly defined, permanent boundary of the Central Line railway. Both the building of substantial numbers of new homes in the Green Belt and breaching a clearly defined, permanent boundary are contrary to Government policies. The local character and rural setting of Theydon Bois are extremely important to its residents and this would be completely lost if the proposed scale of development combined with the loss of Green Belt fields went ahead. The rural setting is particularly noticeable when coming into Theydon Bois Station, with its backdrop of green fields on rising land towards Parsonage Farm and Thrifts Hall Farm. Theydon Bois is not 'better' than any other settlement in the District but I think it has its own unique quality, with its 'dark skies' policy, being surrounded by, and with easy access to, open countryside and Epping Forest, while also being so close to London. It also contributes to the diversity of villages across the District. The 354 new homes proposed would be an increase of more than 20% of the homes presently in the village and is out of proportion to the scale of the settlement. I would also like to point out inconsistencies with the boundaries of the sites put forward, which is very confusing e.g. SR-0026C has a different boundary on pg. 31 of APP. B1.6.5 to that shown on the Detailed Methodology APP. B1.4.1. Breaching of the clearly defined, permanent boundary of the Central Line railway. Sites SR-0026B, SR-0026C, and SR-0228ii The railway line has been a permanent boundary between the village and open fields since Theydon Bois station was opened in 1865. Breaching this boundary for new housing development runs contrary to Paragraph 83 of the NPPF (Green Belt boundaries in Local Plans) - "...having regard to their intended permanence in the long term, so that they should

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becapableofenduringbeyondthep]anperiod"andalsocontrarytoparagraph85 -"When defining boundaries, local planning authorities should: *satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development period...and *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent". If this boundary is breached, there can be no justification (and little likelihood) that a field ditch/hedge boundary will be sufficient to prevent further development east of the railway line. It is very worrying that Para 3.97 of Chapter 3 of the Draft Local Plan states, in relation to future Plan periods "...it is considered likely that further development on land that is currently within the Green Belt will be required". What likelihood is there that a field boundary will hold when the most permanent boundary of the railway line has already been breached?

I also strongly disagree with the way the site selection criteria has indicated that these particular sites are suitable for development. This shows a complete lack of appreciation of landscape character and the historic environment. For example, site SR-0026C Part of Thrifts Hall Farm - 1.8a 'Impact on heritage assets. No effect likely on heritage assets.....' 2.1 'level of harm to the Green Belt' is described as 'very low, low or medium'. 5.1 'Landscape sensitivity. The site falls within an area of medium landscape sensitivity etc' 5.2 'Settlement character sensitivity. Development is unlikely to have an effect on settlement character'. Part of this site (whichever site boundary version is used) is described as "Sensitive Historic Landscape: Pre 18th Century Field" in the Landscape Sensitivity Study carried out in 2009 by Chris Blandford Associates for EFDC, which forms part of the Evidence Base for the new Local Plan. I was concerned to see in APP.BI.6.5 that this is shown with a boundary running somewhere through the middle of the field, with no distinct field boundary! The field in SR-0026C which runs adjacent to the Abridge Road, also about the historic, Grade II listed, Parsonage Farm at the eastern boundary. I strongly disagree with the comments made in the site selection criteria and consider that building a large number of new homes on these Green Belt fields would indeed have a detrimental impact due to a loss of sensitive and historic Green Belt fields which are an important part of the landscape character around Theydon Bois and also due to the impact on the historic and Listed buildings at Parsonage Farm. Both fields in SR-0026C have public footpaths running through them which connect to the network of Public Rights of Way in Essex. These footpaths enable residents and visitors alike (several rambling groups use the footpaths) to enjoy an outdoor exercise, which is free to all, in a pleasant rural setting. I was very annoyed to see that one of the criteria 4.3 'Capacity to improve access to open space' gets a green light because 'development could provide an opportunity to improve links to adjacent existing public open space or provide access to open space which is currently private'. This seems a rather ridiculous statement to make and implies that building lots of houses with some green areas will be an improvement on a presently accessible public footpath in an unspoilt rural setting. Site SR-0026B also forms part of the rural backdrop to the railway line close to Theydon Bois station and the permanent boundary of the railway line would be breached if development went ahead on this former playing field.. It has a public footpath running through it which connects to the network of Public Rights of Way in this part of Essex. The present character is very rural with open views across the railway line to and from Great Gregories open space and City of London buffer land. If houses were to be built on this field, it would greatly harm the landscape character and setting of Theydon Bois village. Neither of Sites SR-0026B or SR-0026C were included on the Issues and Options Consultation. This indicates that they were, quite correctly, not considered suitable for development being in the Green Belt and on the undeveloped eastern side of the railway line. We can only assume that following the I and O Consultation when EFDC re-opened the Call for Sites, the landowners saw the very lucrative opportunity to develop their land and put these sites forward. The production of a new Local Plan should be a carefully planned and sustainable development strategy and not lead by developers who see it as a money making exercise. Site SR-022811 Building on this site would also breach the permanent settlement boundary of the railway line. Some statements in the site selection criteria are incorrect. It is not a car park, nor is it a commercial yard. It is claimed to be operational land by Transport for London but has only been used as such once in the 36 years I have been living in Theydon Bois. Only half of it has hard standing. The site was formerly railway allotments and until recently there were apple trees along with other overgrown vegetation which provided an interesting wildlife area and a pleasant backdrop to the station. It is, of course, in the Green Belt. If even this small site was developed for housing, it would compromise the future of the Green Belt fields beyond. There are no strong boundaries to the east of the railway line which are likely to endure beyond the new Local Plan period and therefore any development on these fields would open up the remainder of the land for development as far as the M1/M25 motorways. Theydon Bois would no longer be a village; it would become a town. My other points of objection, which relate to all of the Green Belt sites proposed, are as follows: The present GP service (branch surgery of The Limes in Epping) is inadequate for the present population. The surgery only

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operates on 4 days a week (no surgery at all on Thursdays) and is frequently closed on other days, often at short notice, due to the lack of GPs available. The site selection criteria gives a 'green light' for health services in Theydon Bois and states that the sites are within 1km of a GP (Health Practice) with capacity to take on new patients. I read elsewhere in the methodology document that the consultants took the average GP/Patient ratio across Essex to come up with this incorrect statement. The GP service in Theydon Bois is clearly overstretched as many residents will confirm and cannot cope with the present population, let alone the proposed increase from 354 new homes. Theydon Bois Primary School is already full to capacity. The Central Line tube service has been running at capacity in the rush hours for a number of years. Lack of alternative transport facilities. In spite of Transport for London presently making statements that there is still capacity and that they can improve the service/frequency of trains, this is not borne out by those who use the service to commute into London every weekday. Although not a regular commuter, I do frequently travel into and out of London and personally experience very difficult and unpleasant journeys with irregular timing of Epping line trains and extreme overcrowding. The proposed increase of population inhabiting the large numbers of new homes proposed for Theydon Bois (and also Epping!) would mean these journeys would become intolerable. The Central Line cannot cope with such an increase in demand. The only alternative public transport facility is an hourly bus service, which is quite inadequate for people travelling to and from their place of employment. This will lead to a reliance on private motor vehicles for many journeys. No employment facilities. Theydon Bois is largely a commuter village for London. Whilst not all new residents would commute into London and a few might be able to work from home, the majority would either commute via the Central Line or drive to their place of work. There are no employment opportunities in Theydon Bois, apart from the limited number of retail outlets etc in the village. The potential employment site proposed (SR- 0552) in Coopersale Lane is in an unsustainable location. (Ref. my comments under Q5) Therefore, the proposed number of new homes would lead to unacceptable commuting conditions on the Central Line and a large increase of journeys by car, leading to more congestion on the roads and increasing pollution in and around the village. Road congestion The Abridge Road (B172) has a 60mph speed limit which is reduced to 30mph on the village side (west) of the viaduct crossing the railway line. Traffic is quite heavy at peak times running through the village in both directions. Alterations could probably be made to the B172 to allow a safer access to the fields east of the Central Line but the significant numbers of housing proposed for these sites would undoubtedly lead to further traffic congestion, which would be detrimental to Theydon Bois. There is also a Protected Linear Woodland stretch running from the Abridge Road and down Station Hill. The increased vehicle movements and associated emissions would be harmful to this Protected Woodland area, particularly as traffic is likely to be queuing to exit from Station Hill. Also, Theydon Bois has limited food and retail shops and the numbers of new homes proposed will mean many more car journeys into and out of the village on the already busy surrounding roads. You cannot carry a week's worth of shopping back on the tube! Theydon Bois does not have the facilities to serve such an increase in population and does not have the space to build such facilities. All of the emphasis seems to be on building new homes, without any clear plans for the infrastructure required. This is not a sustainable approach to new development. Theydon Bois unique Dark Skies Policy Whether or not this policy is formalised in the new Local Plan, it is recognised in the 'key issues to address' and it is a fact that Theydon Bois is unique in having no street lighting and yet being so close to London. This is an intrinsic part of the character of the village and the lack of street lighting means that the surrounding fields and countryside are particularly dark and tranquil at night, making for a more natural environment for wildlife. If new homes are built on our surrounding fields, this will undoubtedly introduce lighting which would be particularly noticeable at night and destroy these presently dark and tranquil areas. It would be out of keeping with the rest of the village and completely change the unique character of Theydon Bois. This is NOT the vision of residents in Theydon Bois. I consider that the proposed housing numbers would be an unsustainable development for Theydon Bois village and would be contrary to Policies in the NPPF. Q7 - Infrastructure - Strongly disagree The approach to providing infrastructure is mainly generalised. The statements about infrastructure being planned alongside any development are insufficient to guarantee that appropriate and adequate infrastructure will be put in place. The problem with first selecting the sites and then insisting that infrastructure is incorporated into the development plans, is that in many cases the infrastructure will not come forward as those developing the sites will find the cost makes the development 'unviable'. In the meantime, the land in these sites will have been blighted by being taken out of the Green Belt and being labelled 'ripe for development'. Q9-Comments on other Policies in the Draft Local Plan Draft Policy SP 5

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Green Belt and District OpenLand I believe that the lack of distinct policies seriously undermines the future protection of Epping Forest District's Green Belt. I would firstly also ask you to look into the following anomaly. For all of the other draft policies, under the heading of 'Alternative Options', the options usually given are: Retain existing policies or No Policy or No Policy or New Policy or similar wording. The reasons for why these options were not used is then explained. However, under the 'Alternative Options' heading for SP 5 the options do not relate to existing or possible new policies, they relate not taking land out of the Green Belt and not making amendments to the Green Belt. Where is the reasoning behind not retaining the Green Belt policies which are proven to be compliant with the NPPF? I am very concerned that there is NO Green Belt policy, other than 'in accordance with national planning policy'. This may seem a very convenient way to cover the subject but I think it is a very dangerous approach and gives the impression that EFDC have given up on some aspects of protecting the Green Belt. Almost all of the present Green Belt policies were found to be compliant with the NPPF. They have been tried and tested over the years and Planning Inspectors are still giving them due weight in recent appeal dismissal decisions. Every district within the Green Belt has its own particular landscape character and distinctive landscape features and settings and threats to the Green Belt which local policies need to cover. The general statements in the NPPF do not include the detail which is needed, nor should they be solely relied upon to protect the Green Belt.

The opening Paragraph 1 of the NPPF states that "It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities". Section 9 of the NPPF - Protecting Green Belt land - is not a substitute for our own distinctive Green Belt policies. Would you please reconsider Draft Policy SP 5 Retain all of the present Green Belt policies which are deemed compliant with the NPPF, unless there is a very good reason why not to retain them. Expand on some policies to more clearly define the acceptable limits of extensions to buildings and replacement buildings ie: What exactly are 'disproportionate additions' Define more clearly 'materially larger' Also- Define more clearly 'limited infilling' which seem to be interpreted in all sorts of ways. These clarifications are needed if we are to protect the landscape character of Epping Forest District in the future. Draft Policy DM 12 - Subterranean, basement development and light wells Part B. I am pleased to see - i) that basement development should not comprise of more than one storey. However, I am concerned about -ii) not exceed 50% of each garden area within the property. This clause appears to be mirroring the permitted development above ground, which allows for up to 50% of the garden area to be developed. However, I believe that this must not be linked to the house, so that the original dwelling should not be so greatly extended. In order to avoid the potential for basement areas under a house to be greatly extended out under a garden, I feel that more clarity should be given to this clause. For example, if a basement is developed under the ground floor of a dwelling, and that floor area is equivalent to 50% of the garden area, does this mean that the limit of a basement development has been met and no further basement would be allowed under the garden? Or does it mean that up to 50% of the garden area could have a basement underneath it in addition to that under the ground floor of the dwelling? If the latter is the case, I would suggest that the basement under the garden should not be linked to the house, as with above ground permitted development, or the total basement area would certainly not be subordinate to the host building. I think it is worth noting that recent Planning Inspectors' decisions show that they do take the size of basements into account in the Green Belt, even though they do not have a visual impact.

I have put a lot of thought into this response and thank you for giving me the opportunity to respond to this important stage in EFDC's new Local Plan. Yours sincerely Susan Warren

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