

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

Stakeholder ID	3364	Name	Fiona	Martin
Method	Letter			
Date	18/1/2017			

This document has been created using information from the Council's database of responses to the Draft Local Plan Consultation 2016. Some elements of the full response such as formatting and images may not appear accurately. Should you wish to review the original response, please contact the Planning Policy team: ldfconsult@eppingforestdc.gov.uk

Letter or Email Response:

Epping Forest Draft Local Plan Questionnaire Comments on Draft Local Plan, December 2016 ...Redacted...
Please add me to the Local Plan mailing list for updates on the progress of the plan. Question 1 Overall, I welcome the Vision for the District set out in the EFDC draft plan, particularly because the Draft Vision states that 'development needs will be met in the most sustainable locations' and that 'access to places by public transport, walking and cycling will be promoted'. However, as a resident of Epping, I strongly disagree that the draft proposals for Epping are compatible with the Vision for the District, particularly with regard to the sustainability of the proposed new developments around the town, in particular in relation to the level of infrastructure that has been proposed. Question 2 Overall, I strongly disagree with Draft Policy SP2. The Council states in Draft Policy SP2 that it 'is proposing an approach which maximises opportunities for development around Harlow and also in locations within the existing settlements, before considering a limited release of Green Belt land'. However, the allocation of new homes to each existing settlement is very uneven - Epping will increase in population size by around 14% of its existing population (based on 2011 census), whilst Laughton will increase by less than 4%, despite being much closer to a junction of the M 11, providing quick links to London and the London-Stansted-Cambridge corridor identified as a growth area in the EFDC Draft Plan. Furthermore, whilst across the District, the loss of green belt land is limited to less than 1 %, most of the sites proposed for new development around Epping are located on land currently designated as Green Belt. This is a result of proposing an excessive number of new homes in a town with very little existing Brown Field land. The proposals for Epping are likely to adversely affect the character of the town over the plan period, with significant areas of new housing being a considerable distance from Epping's town centre facilities, creating housing areas that are unsustainable and in direct contradiction to EFDC's stated aim in the Vision for the Draft Plan that 'development needs will be met in the most sustainable locations'. In my view, consideration should be given to distributing the new homes more evenly across the District, and a greater proportion of new development should occur at sites which have good access to transport corridors, especially around junctions 717A of the M11, where there is the possibility for sustainable increases in transport capacity, and near to stations along the West Anglia rail service, which are key to supporting the London-Stansted-Cambridge corridor. Question 3 Overall, I strongly agree with EFDC's proposals to require a Strategic Masterplan for the development of land around Harlow - around 3, 900 new homes will be a significant increase in the population of the town, and it is essential that the new homes are adequately serviced by appropriate infrastructure, schools, GP surgeries, open and recreational spaces, and employment/retail spaces. A well thought out Masterplan, with stakeholder involvement from the start of the process, should ensure that the proposed new developments are sustainable in terms of their economic, social and environmental role. Question 4 My comments in this section refer to Epping only. Overall, I agree with the

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

Stakeholder ID 3364 Name Fiona Martin

proposed Town Centre designations for Epping. My one comment would be to change the northern end of Epping High Street (from Prezzo to Grove Lane) to primary frontage - Figure 5.5 in the Draft Plan shows this section as secondary frontage, but it currently supports retail/restaurants, and there is no justification for designating it as secondary frontage, given it is contiguous with the remainder of the High Street through the town centre. Question 5 Overall, I agree with the proposals in Draft Policy E1. Question 6 My comments in this section refer to Epping only. Overall, I strongly disagree with the proposed sites for new development in Epping. The proposed sites are scattered around the edges of Epping with seemingly little thought as to the impact these new homes would have on Epping's existing infrastructure - in particular the roads in and through the town, school places, and GP surgery capacity, all of which are already at or near capacity. The overall number of new homes proposed for Epping is unsustainable; however, if the number of dwellings in the Draft Plan is ultimately approved, an alternative approach to site selection would be better able to provide the large number of new dwellings in a manner than is consistent with the sustainability aims of the Draft Vision for the District. Epping currently has two primary schools, Epping Primary School, which moved into new premises recently, and Ivy Chimneys Primary School which, although some new buildings have been provided, is mostly housed in old buildings that do not meet modern standards of sustainable building. Consequently, in order to provide the increased school place capacity in Epping made necessary by the proposed new housing, Ivy Chimneys Primary School would be the preferred choice for expansion, ideally on a new site with modern, purpose built premises. In terms of GP surgeries, Epping currently has two - the High Street GP Surgery (located on the High Street in the town centre) and The Limes Surgery (located at the northern end of town on The Plain). Given that both surgeries are at or near capacity, a new surgery is likely to be needed to accommodate the residents of the proposed 1,640 new homes. In order to meet sustainability criteria, the new surgery should be located at the southern end of Epping, where there is currently a lack of health care facilities. Rather than allocating new housing in pockets around the edges of Epping, a more sustainable option would be to allocate the majority of the housing to a new 'Epping-under-hill' south of Brook Road at the southern end of the town. Areas proposed for development on Brown Field sites within the town should remain in the plan, but other than the proposed areas south of Brook Road, Bridge Hill and Ivy Chimneys Road, the remaining areas proposed for development on land that is currently Green Belt should be removed from the Draft Plan. Instead, additional sites south of Brook Road, Bridge Hill and Ivy Chimneys Road that were proposed initially, but which are not included in the current version of the Draft Plan, should be included, so as to accommodate the building of a new 'local centre'. By concentrating the majority of the new development in one area, in a location which currently suffers from lack of services (especially health, but also basic shopping facilities), the new housing could be accommodated in a manner that is sustainable. The size of the new development would warrant a Strategic Masterplan, which would need to set out provisions for a new, larger primary school, a GP surgery and pharmacy, a local bus station to accommodate an increased number of bus services to the town centre up the hill, public open and recreational space, eg a children's play area and playing field, and space for retail/local employment - in particular a 'Sainsbury's Local' (or equivalent), Post Office, and opportunities for local businesses such as a coffee shop and hairdressers. Since the Draft Plan proposes to redevelop the current sports centre in Epping as housing, a new sports centre with a swimming pool could be located within this new development. The Strategic Masterplan should seek to ensure that the new development provides a sustainable new community, which is able to access all its basic services locally, offer these services to the existing residents in the south of Epping, and access the full complement of services that Epping Town Centre has to offer, through the provision of regular bus services from the Brook Road area to the High Street and beyond. The Draft Plan seeks to replace existing town facilities, such as the sports centre and St Margaret's Hospital, without suggesting alternative locations for these facilities within Epping. As discussed above, a new sports centre and swimming pool could be located within a new community at the southern end of Epping which, provided that bus services to that area are enhanced, could be accessed sustainably by residents from all over Epping. The St Margaret's Hospital site is a mix of new and old buildings with low density. It would be appropriate to make better use of this site by increasing the density of use, but basic health care facilities, eg blood and x-ray services, and community clinics (e.g. midwives, physiotherapy, geriatric services etc) should remain at the site, in order to meet the basic health needs of Epping town residents in a manner that is sustainable - residents should not be required to travel out of Epping for these basic health needs. The Draft Plan has proposed development on the Town Centre and Station car parks. Parking in Epping is already at a premium, with many spaces taken up by commuters travelling to Epping from surrounding areas, including Harlow, to benefit from the cheaper ticket prices on London Underground compared to mainline rail fares. Whilst the proposed developments plan to retain existing car parking capacity and provide additional capacity for the new residents, in order for these developments to be sustainable in the long term

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

in the context of the expansion of Epping and the District as a whole, development on existing car parks within Epping should seek to double existing capacity (excluding additional capacity required for the new residents). The Draft Plan promotes Epping as a centre for tourism and heritage, and as a gateway to Epping Forest. In order to achieve this vision, Epping needs a dedicated Tourist Information Centre and a high quality town centre hotel, as well as facilities to hire bicycles for use in the Forest. The defunct Police Station, EDF Council Offices and/or the buildings at St John's Road which are due for redevelopment could potentially be suitable locations for a Tourist Information Centre and hotel. The redevelopment of the Bell Common Hotel could provide a suitable location for a bicycle hire facility, as it is close to access points into Epping Forest, and the remainder of the site could be allocated for housing. Epping Forest District Draft Local Plan Questionnaire Comments on Draft Local Plan, December 2016 Fiona Martin, 21 The Drummonds, Epping, Essex, CM16 4PJ Page 3 of 5 Question 7 Overall, I strongly disagree with the Draft Infrastructure Delivery Plan (IDP) for the District in its current form. Although the Draft IDP states in paragraph 6.2 that 'in order to deliver sustainable and balanced growth as outlined in [the Draft Local] Plan, significant investment in infrastructure to meet the needs of residents and businesses will be required', there is far too little detail on how this might be achieved. In particular, the Draft IDP does not present evidence of guarantees that the capital required for major infrastructure, such as relief roads, new schools and health facilities, will be forthcoming. In Epping, Figure 5.4 (site allocations for the town) shows the conversion of existing infrastructure, such as the town's sports centre, cricket pitch and hospital housing, without also showing site allocations for the replacement of these facilities within the town. The Draft IDP also fails to provide sufficient detail on the sustainable transport infrastructure which will be required in relation to the scale of residential development within Epping and the surrounding villages. There is no mention of possible measures to ease the existing congestion on the roads into/out of/through Epping far less how to accommodate the additional traffic that new housing will generate. The Draft IDP fails to address the lack of existing car parking spaces in Epping and does not set out how these might be increased to accommodate the additional car parking capacity that will be required over the duration of the Draft Local Plan. No consideration appears to have been given in the Draft IDP for extending the Central Line to North Weald and/or Ongar (either peak hours only or a full service), and the car parking requirements at each station, depending on the frequency of services. No mention has been made of alternative solutions to car use for commuting, such as a Park & Ride scheme, e.g. from Ongar/North Weald/Harlow to Epping Underground Station, despite the evidence that a significant number of commuters travel to Epping by car to access the Central Line into London. The Draft Local Plan should not be adopted without further detailed work on the Infrastructure Delivery Plan in consultant with relevant stakeholders. Specifically, in order for the housing requirements set out in the Plan to be delivered in a manner that is sustainable, the Draft IDP needs to set out the funding arrangements for capital works such as new roads and guarantees from relevant bodies that funding is available for new schools, GP surgeries, health hubs, sports facilities etc; whilst the Draft Local Plan should include details of the proposed locations for these new facilities. For Epping, this information is currently not present in the Draft Local Plan and Draft IDP. Question 8 Several aspects of the Draft Local Plan, in particular as it applies to Epping, promote unsustainable development (see comments above). As such, overall, the Interim Sustainability Appraisal is insufficiently critical of the sustainability (or rather lack thereof) of the Draft Local Plan. In particular, it is insufficiently critical of the Draft Infrastructure Delivery Plan, which lacks sufficient detail for there to be confidence in the delivery of sustainable infrastructure for the lifetime of the Draft Local Plan. The Interim Sustainability Appraisal fails to explore fully the pros and cons of the reasonable alternatives (Table 6.4), which is reflected in the summary spatial strategy alternatives appraisal findings (Table 7.1) being mostly neutral/equal between the five options. In reality, the five options are likely to be significantly different in terms of sustainability, particularly in relation to infrastructure - but the Draft Infrastructure Delivery Plan lacks sufficient detail to allow ranking. Equality Monitoring Form I do not wish to complete the Equality Monitoring Form.

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