

STAPLEFORD ABBOTTS PARISH COUNCIL

OPPOSITION TO THE PROPOSED BUILDING ON LAND IN OAK HILL ROAD

In coming to our decision to oppose the inclusion of the Oak Hill Road site into the Local Plan, we have considered the following factors:

- Impact on the facilities in the area concerned
- Legalities related to the Local Plan process

IMPACT ON THE FACILITIES IN THE AREA CONCERNED

- We realise that the field is flanked on both sides by dwellings, and therefore this could be considered as infilling. However, the Parish Council propose that the following points far outweigh that reason:
 - ❖ The rear boundary of the field is probably unique, inasmuch as it creates a threefold boundary – between Epping Forest and the London Borough of Havering/ between the county of Essex and Greater London/ the EU Electoral boundary.
 - ❖ The field forms a natural barrier between the urbanisation of Havering and the rural aspect of Stapleford Abbots.
 - ❖ There is a major gas pipeline running through the field in question. We as a Council were led to believe that one of the reasons for removing the Travellers from the Epping Lane site was that they were positioned too close to a major gas pipeline. If this reasoning was used to remove mobile homes, surely the same criteria should be used when considering the erection of permanent houses.
- The building of these houses would add 9.20% to the volume of existing properties in the village. In doing so, they would put a further strain to an already overstretched infrastructure.
- ❖ Schools - Stapleford Abbots Primary School and pre-school are at present full to capacity. The village school cannot accommodate more pupils - currently they are operating with half of their school roll being taught in portacabin accommodation. The village also falls between two catchment areas, namely Brentwood and Epping, for the education of students aged 11-16. Both Brentwood and Epping are some distance from Stapleford Abbots, and travel to and from senior schools in these areas already add considerably to the length of a student's day. Both areas are inaccessible by public transport.
- ❖ Doctors and Health Facilities –The designated doctor's surgery for the village is in Abridge. The designated hospitals are Princess Alexandra, Harlow, and St. Margaret's, Epping (non-emergency). All three of these facilities cannot be reached by public transport.
- ❖ Transport – The 375 bus service, Stapleford Abbots to Romford Station, is provided by TfL. Over the past few years, TfL have threatened to discontinue this service. This is a vital service as all the major requirements and amenities are towards, and in, the Romford area. However the bus only runs from 7.15am until 7.30pm, and every 1½ hours, and not on Sundays or Bank Holidays. The 575 service is

provided by a private company. This service utilises the time the bus isn't being used to transport children to school, and the timetable varies.

- ❖ Local Shopping – There is a local, but small shop, and can only supply basic essentials.

- Affordable Housing – Presumably a percentage of the proposed housing will be allocated to affordable housing. The residents of these properties would probably be more reliant on local facilities, which, as pointed out, are at or beyond their limits.

- Current expansion – There has currently been an explosion of granted planning applications: 13 dwellings to the rear of the Royal Oak public house; 9 dwellings at The Drive, Stapleford Road; 5 dwellings at the site of Esperanza Nursery, along with various single dwellings and extensions. Because many properties in Stapleford Abbots have large gardens, or surrounding land, there is an appetite to apply for planning permission to build on this land.

- Roads – Traffic using the B175 is very heavy, particularly at commuter times. The junction of Oak Hill Road and Tysea Hill is busy and dangerous. Access and egress would be almost impossible to manage in both the Stapleford Abbots and the Havering sections of the plot, because there is a sharp blind bend on the border of the two village and an already dangerous junction at Tysea Hill which has impaired vision. Adding further junctions to this particular stretch of road would add to the danger. Widening the road is not feasible as it would affect the historical nature of the villages.

- Other areas for consideration:
 - ❖ Flood issues from building on land near to a brook.
 - ❖ Main effluent drains which currently cannot manage with the existing residential capacity.
 - ❖ Concerns with increased issues with power when the village has regular power cuts.

LEGALITIES RELATED TO THE LOCAL PLAN PROCESS

According to regulations, residents can apparently only dispute the draft Plan under the “test of soundness” because the consultation period has expired; we have collated evidence to address this. The strongest evidence is found to fall under the requirement that the Plan is “consistent with national policy” and the test of soundness links to the following benchmarks:

- **Is the Plan positively prepared** – based on a strategy seeking to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where reasonable, and consistent with achieving sustainable development.

- **Is the Plan justified** – the Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

- **Is the Plan effective** – i.e, deliverable over its period and based on effective joint working on cross-boundary strategic priorities.
- **Is the Plan consistent with National Policy** – the Plan should enable the delivery of sustainable development according to the policies in the Government’s National Planning Policy Framework.

In terms of ‘legal compliance’, the main issues to consider include:

- Undertaking Stakeholder engagement and consultation.
- Carrying out Sustainability Appraisal (including consultation with statutory environmental consultation bodies).
- Identifying and resolving significant cross-boundary issues, and demonstrating the Council has met its duty to cooperate.

This plan is not consistent with national policy for the following reasons:

No consultation was made with relevant stakeholders

- EFDC comment is that it communicated with a large amount of people, but this did not include the villagers upon whom the impact would be greatest.
- The draft local plan (2016) did not include the Stapleford Abbots site so stakeholders from the Stapleford Abbots area were not involved. The current plan appeared on 18 December 2017 – the Stapleford Abbots site was added four days earlier on 14th December 2017.
- The draft plan’s view was that the Stapleford Abbots site wasn’t considered suitable: “The Council does not consider that are distinct special options for locating residential development within Stapleford Abbots.”
- We refute the statement from EFDC that we have no right to contest the development as we did not respond to the original draft. We would not have responded at that time because at that point, Stapleford Abbots was considered unsuitable.
- As the Stapleford Abbots site is now included, we contest that this action renders the consultation null and void and should either be re-started or the Stapleford Abbots site removed from the plan.
- EFDC were asked why only one known resident received a letter about this development; the responded this person was on the council database due to previous correspondence with them about other matters. This is unsound, implying that only people who communicate with EFDC are informed. If this resident had not spread the word, no other resident would know that EFDC did not “undertake stakeholders engagement and consultation.”
- We as a Parish Council would like to know why we were not informed about changes to the Plan.

We do not consider EFDC to have carried out “sustainable appraisal” – namely, the four aspects of consideration for development in a Green Belt area have not been met.

- The proposed development creates rather than contains unrestricted **sprawl of large built up areas**.
- **Preventing neighbouring towns from merging:** the development would join the villages of Stapleford Abbots and Havering Atte Bower.
- We do not consider the condition of **safeguarding the countryside from encroachment** to have been met.
- **Preservation of the special character of historic towns:** the local flora, fauna, historical views and potentially items of historical interest would be removed or impaired by this development. Over many decades the field has only been used for grazing, in the first place by cattle, and later by horses. During these years no fertilizers, insecticides or pesticides have been used.

In the matter of identifying and resolving significant cross-boundary issues, and demonstrating the Council has met its Duty to Cooperate:

- ❖ The proposed site is on the border of Epping Forest District and London Borough of Havering. Access points would cause congestion on the one single-lane road that joins these areas. The only access to the site is via Oak Hill Road, which is entirely in Stapleford Abbots. The whole frontage is a sharp bend and the current entrance is a farm gate with a dropped kerb and joins the road at the sharpest part of the bend. If this was used to access the site, it would create a staggered junction with Tysea Hill, and the approaching traffic from Havering Atte Bower would be unseen to traffic leaving the site. No stakeholders have been consulted about this.

The missing unpublished document is relating to a re-assessment of viability of this site.

The Parish Council were told this would be added as an appendage at a later date. This means that it cannot be scrutinised as part of the Local Plan, and therefore cannot be used as evidence to support the change of Assessment from Stage 2 to Stage 4. We believe that, without this vital document, the Local Plan should not include this site as viable as no evidence supports any change from Stage 2 which was declared at Local Plan Meetings as being unviable.

Regarding our response to EFDC, we reserve the right to add to our initial objection; the EFDC officer we opened a dialogue with has already admitted that some of the information regarding the site has yet to be published. Again, we are forced to question the management of this proposal and its soundness. We are also interested to know if site’s promotor is the actual owner –who would naturally wish to forward a good proposal. We wonder if this is how sites have been identified throughout the Plan’s consultation, and how sound it is as a criterion.