

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

Stakeholder ID 2469 Name Nicola Man

Method Survey

Date

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

Survey Response:

1. Do you agree with the overall vision that the Draft Plan sets out for Epping Forest District?

Strongly disagree

Please explain your choice in Question 1:

There needs to be a larger commitment to including a caveat that the vision for Epping Forest District does not negatively impact on the residents of Harlow who live in close proximity to the strategic sites proposed for development around Harlow.

2. Do you agree with the overall vision that the Draft Plan sets out for Epping Forest District?

Strongly disagree

Please explain your choice in Question 2:

The language used to describe the proposed approach taken suggests that the Council considers Green Belt land around Harlow to be of less value than Green Belt land within other parts of Epping Forest District. The sites around Harlow are also in the Green Belt, so it is not clear that locations within existing settlements have been considered before considering a release of the Green Belt, as the "approach" suggests the development of the Green Belt land around Harlow is definitely to be considered before other Green Belt areas in Epping Forest District. Residents who live close to the strategic sites around Harlow but not within the Epping Forest District boundary have not been notified, through a formal means, of Epping Forest District Council's consultation of the Local Plan e.g. with a letter etc. The proposed strategic sites around Harlow will affect these residents the most. A key group has not been involved throughout the process of formulating this proposed approach, even though the Plan contains a potential huge impact on these residents. Thus, this approach is extremely unlikely to be the most suitable one for the distribution of new housing within the District, as it is missing key input. Harlow's Enterprise Zone status does not contribute to it being the most sustainable location within the HMA at which to concentrate development (as stated in the Draft Local Plan, 3.49). Paragraph 5.2.1 in the Council's Economic and Employment Evidence to Support the Local Plan and Economic Development Strategy Final Report suggests that as these jobs are high-quality, employees in the

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Harlow Enterprise Zone are more likely to live outside Harlow and instead live in Epping Forest District, as there are more large family homes. Therefore, this is a reason to concentrate development in other areas of Epping Forest District.

3. Do you agree with the proposals for development around Harlow?

Strongly disagree

Please explain your choice in Question 3:

I disagree with the proposals for strategic sites L (Riddings Lane Garden Centre) and M (Latton Priory). In determining the appropriate sites for development in other areas within Epping Forest District, the sites were considered in accordance with the order of priority listed in 3.54 in the Draft Local Plan. This order of priority was NOT taken into account when assessing the strategic sites around Harlow, and no explanation has been provided as to why. In not using this order of priority, inappropriate sites could have been selected. For example, site M which is agricultural land Grade 1-3 could have been selected before other sites around Harlow of less agricultural quality. It implies that any sites around Harlow could be developed regardless of their statuses of being Green Belt land or agricultural land etc., as long as their location was suitable for the North-South/East-West Transport Corridor. It also implies that agricultural land of Grade 1-3 around Harlow is less valuable than agricultural land of Grade 1-3 in the rest of Epping Forest District. This is also contrary to NPPF Paragraph 112. Residents who live close to the strategic sites around Harlow but not within the Epping Forest District boundary have not been notified, through a formal means, of Epping Forest District Council's consultation of the Local Plan e.g. with a letter etc. The proposed strategic sites around Harlow will affect these residents the most, but they can only find out about these potential important changes in their area by chance. By failing to notify these residents about these strategic sites, it is similar to granting outline planning permission for a development without consulting neighbouring residents. Site L is far from the Town Centre, cycle paths, railway station and Harlow Station and thus may encourage use of private car, which is unsustainable. - Site L may not accommodate 50 dwellings. Site L is partly within the 250m buffer for Ancient Woodland, partially within the Deciduous Woodland buffer zone and within the 250m buffer for the Mark Bushes Complex LWS. However, the proposed number of dwellings is 50. In order to maintain the local character of the surrounding areas, the site is also required to have significant greenspace akin to that of Corner Meadow. Thus to accommodate all these constraints, it seems unlikely that 50 dwellings can fit on the site. Site M will lead to the loss of Ancient trees. There are 19 Ancient trees directly affected by the site. The trees are concentrated within the centre of the site, and development may directly affect a portion of the trees. The density of the dispersed trees is such that direct harm is likely, according to Appendix B1.4.2 - Extract for North Weald Bassett (p226-267 of full Appendix). Development on site M would be likely to adversely affect the wider landscape character according to Appendix B1.4.2 - Extract for North Weald Bassett (p226-267 of full Appendix). Site M would have negative effects on biodiversity. In the URS Interim SA Report 2012, it states the HAR3 area, which includes this site, "includes the Mark bushes and Latton Park replanted ancient woodland, and so development here could have a direct negative effect on biodiversity". Site M encourages private car use. In the URS Interim SA Report 2012, it states the HAR3 area, which includes this site, "is in close proximity to Junction 7 of the M11, and so this could encourage private car use." The URS Interim SA Report 2012 earmarked that site M (see ref. HAR3 in report) would lead to significant negative effects if developed, as it stated "The landscape ridge to the south of Harlow is an integral and vital feature that should not be breached by development or associated infrastructure. As such, HAR3 would result in significant negative effects". The proposed sites are at odds with the Harlow Area Study 2005. For example, site M is high-quality agricultural land, which is contrary to the Study as it suggests to "minimise development of agricultural land with high fertility", and "identify important agricultural land as rural containment for the town". Sites L and M are also far from the nearest railway station, but the Study suggests locations of developments should be "based on walkable catchment areas to help increase accessibility to bus stops and the railway stations". There are errors in the evidence provided by the Harlow Strategic Site Assessment

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Report. This is contrary to paragraph 3.66 in the Draft Local Plan, which suggests the Assessment is robust evidence. For example, the Site Pro-forma for site L states that there is a residential area of Harlow that lies to the West of the site, which is untrue. It also states that the site has a low contribution to the Green Belt. However, the Epping Forest District Council's Green Belt Review Stage One found that site L (contained with the parcel DSR 073) does indeed make a strong contribution being an effective barrier against sprawl from Harlow and assists in safeguarding the countryside from encroachment; and Stage 2 found that the resultant harm of releasing parcel 073.3 (which contains site L) would be "High". It also states Site L and M are in (or close to, as in the case of Latton Priory) an area of moderate deprivation, but this is again untrue as Hawthorns, Hillyfield, Corner Meadow and Riddings House are some of the most affluent areas in Harlow, as can be seen from household incomes and the property values in the area. Development on site M would result in "Very high" harm to the Green Belt purposes if released from the Green Belt, according to Epping Forest District Council's Green Belt Review Stage 2.

4. Do you agree with the proposed shopping area in...

Epping?

No opinion

Buckhurst Hill?

No opinion

Loughton Broadway?

No opinion

Chipping Ongar?

No opinion

Loughton High Road?

No opinion

Waltham Abbey?

No opinion

Please explain your choice in Question 4:

5. Do you agree with the proposals for new employment development?

Please explain your choice in Question 5:

6. Do you agree with the proposed sites in your area?

Epping (Draft Policy P 1):

No opinion

Please provide reasons for your view on Epping:

Loughton (Draft Policy P 2)

No opinion

Please provide reasons for your view on Loughton:

Waltham Abbey (Draft Policy P 3)

No opinion

Please provide reasons for your view on Waltham Abbey:

Chipping Ongar (Draft Policy P 4)

No opinion

Please provide reasons for your view on Chipping Ongar:

Buckhurst Hill (Draft Policy P 5)

No opinion

Please provide reasons for your view on Buckhurst Hill:

North Weald Bassett (Draft Policy P 6)

No opinion

Please provide reasons for your view on North Weald Bassett:

Chigwell (Draft Policy P 7)

No opinion

Please provide reasons for your view on North Weald Bassett:

Theydon Bois (Draft Policy P 8)

No opinion

Please provide reasons for your view on Theydon Bois:

Roydon (Draft Policy P 9)

No opinion

Please provide reasons for your view on Roydon:

Nazeing (Draft Policy P 10)

No opinion

Please provide reasons for your view on Nazeing:

Thornwood (Draft Policy P 11)

No opinion

Please provide reasons for your view on Thornwood:

Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sewardstonbury, Sheering, Stapleford Abbots (Draft Policy P 12)

No opinion

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Please provide reasons for your view on Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sewardstonbury, Sheering, Stapleford Abbots:

7. Do you agree with the approach to infrastructure provision being proposed in the plan?

Strongly disagree

Please explain your choice in Question 7:

Infrastructure provision is vital to developments, and so I believe it is important to understand whether proposed sites for development can be accommodated within the infrastructure of the local area before selecting them as strategic sites.

8. An Interim Sustainability Appraisal has been commissioned to support the Draft Local Plan. We would welcome any comments you may have on this.
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9. Do you wish to comment on any other policies in the Draft Local Plan?