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

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Method	Letter			
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Letter or Email Response:

I wish to provide my view on the Epping Forest District Draft Local Plan as part of the consultation. I would like to start by stating that I welcome consultation and fully understand the need to deliver growth in both employment and housing. However, there are a number of significant issues and concerns with the plan in its current form to meet these goals. I disagree that the feedback already provided by the community has been taken into account. The top three priorities for residents are protecting the green belt, encouraging the growth of local jobs and businesses and providing facilities for the community. However, for Epping this plan would mean the destruction of green belt, no new economic zones and building on existing ones and the removal of numerous vital sports and health facilities such as parks, sports centre, cricket pitches, etc. The EFDC literature also claims that this plan means new homes for our children and grandchildren. However, the plan sets out its purpose as providing additional housing largely for those moving into the area. Furthermore, it claims to identify the infrastructure we need whereas in reality it contains almost no information on where, when and who will fund the additional infrastructure that will be required to support the existing, and your intended, larger population. As per the ARUP report September 2016 "the forecast capacity figures show that current infrastructure will be under significant pressure to accommodate the growing pupil population." I believe the Local Draft Plan is not fit for consultation. There is no detail on what will be built (just the number of dwellings and the size of plot in hectares). In order to fully consult, residents need more details on the density of housing and whether sites are being zoned for single dwellings / family homes or high / low density and whether the affordable housing is to be distributed or concentrated in one area. The St John's Road site of the old primary school is not included. It would be useful to know the plans for this in order to consider as a whole as a great many homes could be built on this site. The plan hangs on several incorrect assumptions. Firstly, that there is a need for 11,400 new homes in the district. The research does not show that the current residents of the district need this number of homes or will do in the future. It merely demonstrates that there is a wish for new homes from people outside the district e.g. London who would like to move to the area. In building new homes for commuters in this way it would negatively impact the very reasons people want to move here e.g. green spaces. By deliberately attracting people who commute into London and are not taking part in the local community for the majority of the week would change the very nature of Epping. The High Street will no longer be able to sustain the range of independent shops that residents value but will instead lead to even more chains and the loss of local jobs. The plan states it intends to encourage local businesses. There should therefore be a concrete plan towards ensuring Epping does not become a dormitory suburb and a clone town. The PwC and Local Data Company report published in October 2016 shows that high streets are under great pressure and traditional shops, that would be favoured by the ageing population, are being replaced by chains, in particular food and beverage outlets. A trend, unfortunately, played out in Epping in recent

years. I'd like to see favourable rates for local, independent stores and a commitment to limit the number of chains to ensure Epping does not become any other bland town but rather retains its charm and character and status as somewhere people want to visit and live. I do not see the clear evidence that this 11,400 number matches the projected need for the district, nor that there is a correlation between the types of dwellings and the projections over the period for the demographic e.g. predictions of an ageing population should equate to a higher number of single-person dwellings. The number of houses being built is in fact being led by the developers and land owners and their projected profits not the needs of the residents. Secondly, the plan assumes that proximity to transport links, in particular the central line, are the most important factor in location and therefore favours sites to the south of Epping. This argument has several flaws. It is clear from the parking situation at Epping tube station, Epping car parks and surrounding residential roads that many people currently drive into Epping to use the tube each day. It should not therefore be assumed that homes need to be built the closest walk from the station. However, the further reaches of the proposed estates to the south would be further from the tube that many alternative sites not proposed to the north and west (but not up a steep hill, on a flood plain and close to the motorway). The research claims that there is capacity on the central line but there is no mention of a coherent plan for increased passenger demand. Most tubes leave Epping full during peak times. The plan does not fully recognise the increase in demand for the tube from the increase in housing planned in other nearby communities e.g. even more people would drive to Epping from North Weald and Harlow. It would be interesting to see research into opening up the tube to North Weald and Ongar or reducing fares from Harlow to Liverpool Street and adding that to the oyster network to relieve the pressure on capacity and parking at Epping. Looking at the distribution of housing across the district; North Weald, Epping and Theydon have a disproportionate amount. The attempt to justify this based on proximity to shopping centres or the central line is flawed. The housing estates proposed to the south of Epping (SR-0069, SR-0069/33, SR-0113B, SR0153, SR0445) would be so far from Epping High Street shops to make walking up a steep hill out of the question for most people. These sites are all located on a flood plain. The studies carried out by EFDC to-date are inadequate. Sites to the north and west of the town have been ruled out as a flood risk yet if a survey was carried out on any day with considerable rainfall it would be clear to see that the rain pours downhill onto this land. Site SR-0113B in particular has brooks to two sides of it that help collect and redirect such flood water. There is no mention how these would be diverted. The traffic on Brook Road and Ivy Chimneys Road at peak times is already an issue. I have witnessed numerous incidents of road rage, cars reversing, stand offs etc. It is my understanding that the traffic survey took place during school holidays and is therefore not fit for purpose. There is no detail in the plan how the roads would cope with the existing congestion plus the additional traffic as a result of the hundreds of additional houses proposed to the south of this area, as well as the traffic arising from the other homes being built around the district. There will be an increase in nitrous oxide pollution as a result of this increased traffic which is disturbing, particularly around Ivy Chimneys primary School. I am also concerned by the lack of employment sites and how this fits with the commitment to grow jobs and businesses. I would favour using proposed housing sites SR-0587 and SR-0556 for employment not housing. As proximity to the tube is not in fact a driver, I propose that EFDC considers increasing the density across a number of smaller communities by additional sites "within existing settlements" as it in fact claims is the priority, before developing to the southern fringes of Epping. Ongar, Thornwood, Nazeing, Epping Green and many other villages could easily accommodate small estates within their current infrastructure, and in many cases, would welcome the injection into their village life, in particular if these are well thought out and designed e.g. as garden villages. Harlow has indicated it would welcome further development and this could help to rejuvenate the town centre, although there is sufficient land within Harlow without needing to destroy their green belt too. I disagree with the plan's proposal for building on green belt land. The green belt is not being 'released' but rather 'destroyed' and this use of wording is insulting. The rationale for the green belt was debated and passed through parliament many decades ago. It is not for EFDC to decide this no longer applies. There is no evidence provided that the green belt should be challenged but rather the plan merely uses up sufficient green belt to satisfy the 11,400 number it has (incorrectly) chosen. There has to be 'exceptional circumstances' to alter green belt boundaries and these have not been shown. We have a responsibility to protect the green belt for Londoners and future generations to prevent sprawl and in EFDC's words "protect our natural environment" and "ensure Epping Forest remains an attractive place to live, work and visit." I do not see that EFDC has exhausted all empty homes and brownfield sites first before considering the destruction of the green belt. The plan proposes developing sports facilities but offers no details of where these will be replaced. These are essential leisure facilities for the health and well-being of current residents. I propose that details of where they will be relocated to (within Epping?) and where the funding will come from be published before this be allowed to

proceed. I would prefer to keep St Margarets hospital open. Princess Alexandra Hospital in Harlow is under- performing and already stretched. An ageing and growing population in Epping requires local facilities and will not be able to travel to Harlow for all their needs. Conclusion I disagree with the proposals in the plan. The plan does not have sufficient detail to allow residents to make informed decisions. There is no detail of the types or densities of housing, no details on affordable housing and no infrastructure delivery plan. Given the cost of the plan to-date it is a waste of council tax to be in this situation, being presented with a plan not fit for consultation and with so many gaps in the analysis an proposals. The EFDC has not obtained commitments from the county council to determine if the necessary plans would be carried out (e.g. roads, schools, hospital, doctors etc.) or from TFL for increasing tube capacity. The plan does not take into account previous resident feedback to protect the green belt, encourage job growth and provide facilities but, in fact, goes contrary to each of these. The methodology for selecting sites has been poor. They are not “homes in sustainable locations we have chosen” as is claimed by EDFC but rather houses in sites chosen because land owners wish to sell. Sites should be selected based on objective merit. The plan proposed too many homes overall and too many for Epping. I disagree with building on green belt land. I suggest sites in other communities and to the north-west of Epping would be preferable based on the criteria the EFDC claims to use. With regards to North Weald airfield I absolutely support its use for aviation and leisure at the site and seek reassurance it is to be safeguarded from further development not only on the site itself but in close proximity, and at the same time actively promoting and supporting its expanded use to ensure it remains viable for the long term as part of the EFDC commitment to support local businesses. I believe these issues should be rectified and any suggested sites be considered before a further consultation is included in the schedule.