

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

Stakeholder ID 2602 Name Nathan Wells

Method Survey

Date

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### Survey Response:

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

Please explain your choice in Question 1:

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

Please explain your choice in Question 2:

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

Strongly disagree

Please explain your choice in Question 3:

(1) The proposals involve a massive expansion of residential housing in Harlow, but no evidence has been put forward to establish that any expansion of the scale proposed is necessary. Indeed it is accepted that "The identified housing supply to 2033 exceeds the requirement" (para.3.62). (2) It is not in doubt that Harlow town centre is in need of significant regeneration, and no doubt an overall increase in employment opportunities and general economic/commercial wellbeing would be most welcome. However, it is proposed to build no less than 16,000 new homes in Harlow, with no reasoned explanation as to who is supposed to live in them or why such a huge increase in housing stock is required. It would be naïve in the extreme to assume - particularly in the current socio-political climate - that if thousands of new houses are built, then somehow employment opportunities and economic development will automatically increase. It makes much more sense to channel efforts and resources into regenerating the town centre and making concrete efforts to increase commercial development and employment, and then to plan for any necessary additional housing stock when a real need can actually be identified and supported. (3) The proposals for "delivering" new jobs, which would obviously be essential to support such a huge residential development project, are merely abstract and aspirational. As far as I can see, there are no guarantees of significant employment increase in Draft Policy

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SP2(C) and no concrete proposals. (4) Road traffic in Harlow and train traffic from Harlow to London is at, or beyond, full capacity. To anyone who travels regularly through or from Harlow by car or train, it should be abundantly clear that the enormous additional burden on the transport system that would be created by 16,000 new homes could simply not be supported. Draft policy SP3(B) contains the bland statement that "Sites must also provide the necessary infrastructure including highways and transport infrastructure" - the existing road and rail system could not take the strain of 16,000 new homes, and massive (and extremely costly and time-consuming) works would be needed to even try to accommodate the new burden. (5) The same point needs to be made in relation to smaller settlements on the outskirts of Harlow (such as Roydon), which already suffer from large amounts of commuter traffic destined for Harlow. This point is one of enormous practical significance, but is simply not addressed in the report. (6) While the new towns have attracted frequent criticism over the years, Harlow has in fact been well developed, with plenty of green recreational areas. It is also fortunate in being surrounded by a number of small and historically important settlements just beyond its edges, such as Roydon, Gilston and Eastwick. It appears that the proposal would have the effect of simply incorporating villages like Gilston within Harlow town, and while it is noted that earlier consultation has stressed the importance of ensuring that villages such as Roydon are not simply taken over by Harlow (para.3.44) the risk of such urban sprawl must inevitably be increased by the proposed large-scale expansion. This simply cannot be justified on the basis of a general perception in certain quarters that it would be a good idea to make Harlow much bigger - no case has been made out for the proposed significant expansion of Harlow being necessary.

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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:

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

Please explain your choice in Question 5:

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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**

Please provide reasons for your view on Roydon:

(1) Para.5.154 refers to "the identified housing requirement", but in fact the report does not explain the basis on which it is said that there is any requirement for significant additional housing in Roydon. There are no employment opportunities outside the extremely limited number of shops and businesses in the village. Consequently, the great majority of any new houses would be likely to house commuters working in London, Harlow or similar. This does not justify further significant development in an area which the report correctly identifies as having "a very distinctive character and heritage" (para.5.150). (2) Rail and road traffic is a very important consideration in Roydon. Road traffic is already at very high levels during peak times, and is exacerbated by commuter traffic destined for Harlow (which would be very substantially increased if the proposed introduction of 16,000 new homes into Harlow itself were to go ahead). Commuter services into Liverpool Street appear to be at full capacity, and are in addition regularly affected by delays, cancellations and "train faults". The introduction of a (comparatively) significant number of new homes can only increase existing travel and traffic problems. Draft policy P9(C) states that "Infrastructure requirements must be

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delivered at a rate and scale to meet the needs that arise from the proposed development". Again this is stated at a high level of abstraction, which entirely fails to address how, in practice, extant traffic problems could be prevented from getting even worse as a result of the advent of 40 new homes. (3) Para.5.149 notes concern about loss of the village's character. Those concerns will only be increased by the building of 40 new properties on 4 sites in the village (one of which appears to be extremely small and two of which are almost contiguous). (4) It appears to be proposed that all 4 sites are to be built on existing Green Belt. This is quite unjustifiable, given the importance of seeking to maintain the existing character of the village and the apparently complete absence of any explanation of why 40 new houses are supposed to be necessary.

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**

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

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

Please explain your choice in Question 7:

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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?

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