

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

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Letter or Email Response:

We wish to express concern with the Epping Forest Draft Local Plan and to ask the 'Plan' be changed to retain the areas of green belt in the town of Epping. The particular areas of most concern to me are marked on the 'Plan' (policy document SP2) as SR-0113B, SR-0069, and SR0069/33. These sites are completely unsuitable for housing and development, SR-0113B in particular. The Plan proposal to increase housing in these sectors, which will suffer the worst due housing density proposals does not fully take into consideration the certain degradation of air quality and noise pollution; and, as a consequence, increased malign and potentially life threatening asthmatic and oncological affects upon residents, particularly the most vulnerable children (who walk along the adjacent roads to school) and the elderly. Police accident black spots, and severe congestion (during school run times) constantly blight roads on and between Ivy Chimneys Brook Road, through Stewards Green Road. Sites SR-0113B, SR-0113B, SR-0069, SR0069/33, if developed will only mean an increase traffic, congestion, pollution, road accidents and health problems. Brook Road and Ivy Chimneys already suffer parking issues and you are only ever able to fit one car going one way down the these roads due to parked cars, this is especially dangerous near Ivy chimneys School and under the railway bridge at Brook Road which is regularly used by school children. There is a distinct lack of school places (only 2 local primary schools and one senior school) it is impossible to get a doctors appointment with only 2 local surgeries and you can no longer get into an NHS dentist.

1. SUMMARY 1.1 Epping is a fabulous town, with a rich history and great potential to be a destination for living, visiting and facilities. Because of that, great care and judgement needs to be taken in its future development and expansion. 1.2 It is in this vein that we observe that Epping is bearing a disproportionate burden in the Local Plan in relation to: (a) population increase - c.33% in Epping vs c.21% for the whole of Epping Forest District (which on a weighted basis taking into account the disproportionate rise in Epping brings the estimated population increase down to 19% for the rump of the District - a 12% disparity); and (b) the number of new dwellings - c.14% of the total for the whole of Epping Forest District in the Local Plan when its number of dwellings only accounts for c.9% currently, This is excessive in our view and takes no account of the lack of coherent traffic management within the town or future facilities (for example, there is no mention of the proposed Epping Town development which would revolutionise the centre for residents and visitors during the day and at night). 1.3 A piecemeal approach to releasing sites around Epping may seem an easier and more attractive approach, but once bits of the Green Belt are removed, the integrity is reduced and so its benefits begin to be lost. As such, focus should be concentrated on a garden village (or a large site incorporating the majority of development) attached to Epping which would lessen the impact on Epping and the Green Belt. That way, proper access arrangements and facilities can be designed to enhance the town as a place to live and prevent development creep and piecemeal development which will erode the town's character.

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We give some suggestions below.

2. DISPROPORTIONATE BURDEN

2.1 We consider that Epping is taking a disproportionate number of dwellings in the planned allocation in the Local Plan.

2.2 The Local Plan states that Epping Forest District ("EFD") should absorb an increase of "11,400 new homes". The 2011 census produced by the Office for National Statistics ("ONS") provides data that each dwelling in the UK contains an average of 2.3 people. There is no evidence in the Local Plan or supporting information that this average does not apply to EFD. A conversion of the "11,400 new homes" proposed in the Local Plan to a population increase figure (assuming no net migration from the area) using a multiplier of 2.3 leads to a population increase of 26,220 by 2033.

2.3 EFD has an estimated population of 124,700 (ONS mid-year estimates 2010)¹. The addition of 26,220 people to EFD would result in an 21% increase in population and total 147,300 residents. The ONS forecasts EFD to have a 10.7% population increase in the period from 2014 to 2024². Compounding that growth through to 2033 gives a population of 145,240, which ties in with the calculation based on the number of new proposed dwellings (although it assumes full occupancy of all dwellings in the area now and then and also no change in occupancy from single people and couples to families with 2 children or more).

2.4 Epping itself had 11,461 residents in 2011 (i.e. the same census used to obtain the figure of 124,700). The absorption of 1,640 new homes³ (on an average occupancy basis of 2.3) results in an additional 3,772 residents (i.e. an increase of c.33%).

2.5 This is a disproportionate number for Epping, which is made all the more stark by recalculating the increase in EFD when not including Epping itself (i.e. on a weighted basis) which means Epping is assuming a c.33% population increase and the rest of EFD a c.19% increase. This should be rectified in the Local Plan and appropriate adjustments made.

2.6 Finally, it is noted that a number of the infrastructure considerations (for example in the Epping Forest Open Space, Sport and Recreation Assessment from June 2012 use different and smaller population growth forecasts and therefore these surveys and data should be rerun to ensure that there is no infrastructure shortfall).

3. INFRASTRUCTURE

3.1 The Local Plan is a 15 year plan which will impact Epping and its surrounds for a long time and there should be careful consideration of the needs of the town as a whole (schools, medical facilities, roads, utilities etc.) and not just revolving around new dwellings.

3.2 There is no consideration within the Local Plan of the civic, community, recreational, educational or heritage needs and demands of the town (for example, the St John's Road development should be included). These concerns, along with related infrastructure and access, should be considered as one so that the future enjoyment of the town by its existing residents can be ensured. There is too much focus on new dwellings for new people and not enough consideration of existing residents.

4. TRANSPORT

4.1 Traffic in Epping is frequently at a standstill and this does not serve residents, visitors or those commuting to and from Greater London by car and increases pollution and noise.

4.2 Insufficient thought has been given to traffic in the Local Plan. Whilst the Local Plan quite rightly focuses on additional housing, the town we are not going to attract local people to the area to live or visit or use the local town for shopping and restaurants/nightlife if their journey is unpleasant or difficult. Further detailed assessment needs to be made about this and the relevant costs each developer should bear when obtaining rights to develop certain plots and this should be completed on an assessment based on accurate population forecasts (see paragraph (A)2.6 above).

4.3 In particular, that Infrastructure Delivery Plan states very clearly that discussions with Essex County Council have highlighted in particular that the road through the centre of Epping (B1393) currently experiences significant congestion problems - particularly around the Ivy Chimneys/Bell Common traffic lights and Wake Arms roundabout.

4.4 Of the six sites in particular noted as "operating noticeably above capacity", three of them are within 1.4 miles of each other and effectively cover the entirety of Epping. It is a linear settlement and linear settlements will always have traffic issues - but the Local Plan is a great opportunity to find an effective solution which preserves the character of the town and ensures people have good access in and to its facilities.

4.5 One of the key attractions for residents in Epping who are workers in central London is direct access to the City and beyond on the Tube. The Tube is already very busy in the mornings and evenings (seats during the morning rush hour can be taken by Theydon Bois and not available at all on the return leg home). Whilst it is noted that TFL have stated that the trains need to be more used before they consider increasing capacity, this has a knock-on impact 3 i.e. as proposed in the Local Plan for Epping solely down the line where people who are reliant on the Tube before other access points (notably Woodford, South Woodford and Snaresbrook before frequency increases) frequently have to wait before a train with standing capacity becomes available. This issue will become more acute with the increased population in Epping and EFD and the target demographic for that increase (who are more likely to use the Tube during peak hours).

4.6 We note that a high level commentary has been produced regarding this in the Infrastructure Delivery Plan dated 30 September 2016 which accompanied the Local Plan, but given the transformational change being

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proposed to Epping, then more detail should be provided as transport requirements/solutions and population numbers should go hand in glove (not “chicken or egg”). 5. ALTERNATIVE SITES We note in paragraph (A)1.3 above our concerns about a piecemeal approach to releasing sites around Epping may seem an easier and more attractive approach, but once bits of the Green Belt are removed, the integrity is reduced and so its benefits begin to be lost. As such, focus should be concentrated on a garden village (or a large site incorporating the majority of development) attached to Epping which would lessen the impact on Epping and the Green Belt. That way, proper access arrangements and facilities can be designed to enhance the town as a place to live and prevent development creep and piecemeal development which will erode the town’s character.