



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

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## Letter or Email Response:

EFDC draft plan - site SR-0132Ci Responses to ARUP assessment I consider the ARUP assessment of this site is inadequate in several measures. Some of these may be due to lack of local knowledge of the site and the people. There is a lack of clarity about numbers and areas. The total is about 9 hectares, of which the present sports ground is about 1/3, so "new " land = about 6 ha. The plan suggests 65 dwellings. Now 65 dwellings in 6 ha = 10.5 dph. The dph is not quoted on the document (it is on most others, at 30 dph), yet 5.2 says "higher density". Whereas the EFDC document 15137569\_1668961393129 ... 5842935362541380\_o.jpg describes the site as "low density" with only 49 houses (not 65) - contradictions here which do not give confidence. If the Sports ground is relocated to an equivalent area, what will be the intention for the remaining 3 hectares west of Bury Lane? This assumes that the 65 dwellings are to all go on the existing sports ground (which is then about 30dph). A "higher density" of dwellings will sit uncomfortably in the surrounding area, which is of many older, larger properties - including one listed in architectural guides. To analyse the ARUP points: 1.1 The "recreational pressure" will be moved further from the centre of town which will be more difficult to access and will generate more traffic. People need leisure near where they live, not further away; the result will be less leisure activity - contrary to the Plan's Vision 1.3b Most of the at-risk trees will be those on the western edges of both sites. These are significant features in the scenery, visible from some way. They are of ancient heritage, those on Bury Lane have an informal footpath along a deliberately planted stately double avenue of chestnuts, my children and many others have conker-gathered there for years. I believe these were partly planted as a wind break - the Victorians knew things about the microclimate? 2.1 The area to the West of Lower Bury Lane is not "enclosed by development" - there are a few houses on the other side of the road and a farm. To thus imply that any development there would be "infill" is a gross distortion. 3.2 The bus stops on the High Road are presumably those referred to. Please get reports from bus companies; they were only put in as part of the transport planning for the new school, and partly driven by the pavement in the top of Lower Bury Lane being on the "dead" side of the route (therefore almost never used!) Have the bus stops been evaluated? My observation is that the stop going into town is used very occasionally, while that going South, is possibly used once a day in summer only; there is no pavement here - a steep muddy bank and a pond, with no safe way to cross the High Road, are we suggesting mums with prams and old folks use this stop? 4.1 Yes it is Green Belt. Please see the community views published in the EFDC initial door-to-door booklet, accompanied by the statement "This is your plan". 4.3 On the question of access to green space, there is a misunderstanding here. The present Sports Ground is private in name only. It is well-known locally as an informal public green area. I have lived here for some 30 years, in that time I have participated in (or seen) the following (and more) - casual walking, dog exercising, kite and model aeroplane flying, children (individual, families and social groups) playing, children having informal games, picnics under the trees, golf practise, retirees sitting in the

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sun and chatting, and even very occasionally rough sleeping by gentlemen of the road. All these are tolerated by the Cricket Club particularly, on the understanding that the place is left clean, and there is no interference with sports events. This multiple use is successful because the field can be easily accessed on foot along a guiet lane, and the access and use are informally supervised by local residents, and recently by the School. Moving the Sports area across Bury Lane would probably cause those activities to cease, in that it will be further from town, much less accessible on foot and require a crossing of an already-dangerous Bury Lane. Then one looks back at an EFDC "Open Space, Sport and Recreation Assessment" of the District in 2012. In para 3.15 this notes that the access category for Epping Cricket Club is "A(ii)" - identified in para 3.14 as being in the "Secured Community Pitches" section of the Sport England categorisation which are "Pitches in the voluntary, private or commercial sector which are open to members of the public (where there is a charge, this must be reasonable and affordable for the local community)." 5 Landscape. I would recommend a visit to the fields West of Bury Lane. They are on the top of a slope, with wide views North towards the Crispey Brook valley, and away West towards Copped Hall (which is just visible). Vice versa, the top of the site is visible from a fair distance away and will impair the view (landscape amenity). 6.1 Topography. This is not a neutral impact. The fields West of Bury Lane are sloping. To put a cricket pitch and tennis courts there would necessitate a lot of costly groundworks to level the land and improve drainage. The existing Sports area already (largely) satisfies those requirements. As in 1.3b the site is generally windy, so windbreaking will be required if we expect people to buy homes and live there. A comparison with Bedminster Down in Bristol comes to mind. 6.4 The implications on roads, safely and congestion have been dismissed. However.... 1/ Firstly, the end part of Lower Bury Lane was closed off for safety reasons when the new school was opened. It is densely used by some 300 pedestrians (students and staff), largely (but not exclusively) in the morning and afternoon times. So now the Plan proposes to service 65 dwellings (possibly 150 cars) from this very same highway. 2/ The top end of Lower Bury Lane is a maelstrom of parents and carers in their cars and vans, and a minibus, delivering and collecting their children, twice a day. There are absolutely reliable queues, delays and raised tempers. People have parked on double yellows and driveways, and blocked the road etc. Residents have learned to avoid these 2 periods and emergency vehicles would suffer a delay. The school staff come out most days, but have no authority. So now EFDC plan to deliberately increase the traffic flow. 3/ The junction of Lower Bury Lane with the High Road is difficult to negotiate by car already; South-bound traffic is sometimes speeding up to leave town, and the Northbound speed camera evens up the flow to render gaps to pull out infrequent. Then when the traffic is slow queuing, or static (very common) drivers in the High Road are reluctant to lose their "place in the queue". This junction is made even worse by the students walking in the roadway (the pavement having been put on the wrong side) and the 30+ mornings a year when the junction is directly into the sunrise. To add more traffic into that mix... 4/ Bury Lane is narrow and winding, with blind corners, no pavement, a school entrance, parents stopping to collect, and a high speed limit. To add more traffic to that...... The end-exits from Bury Lane - onto the High Road, and round through Lindsay Street are already nearly perpetual tailbacks. A glance at a SatNav will show they are nearly always red on the screen. The Council's transport planners ruled out improving either of those at the last public consultation. 5/ Moving the Sports clubs will increase traffic. Some people presently walk - I can quote 4 just from my limited knowledge. They have said they will drive to the proposed new site, especially as Bury Lane is already dangerous (and will become more so). 6/ The draft Plan says in 4.76 that some local roads will be "at capacity by 2026". Anyone who uses Epping's roads will believe that many are already over capacity for much of the day. Even in the 1980's Just Good Friends TV series Epping was famous for traffic congestion, things are much worse now! I asked ldf for a definition of capacity on 1st October and have had no reply yet, despite promises. My research suggests that most measures of capacity are in cars per hour - but if traffic is crawling or stationary, that measure is nulled. Part of the problem for this site is the regular-as-clockwork tailback from the traffic lights at lvy Chimneys. This starts at shortly after 8am, and rarely clears before 7pm. The Plan speaks of "managing" traffic flows. If this is possible - please would the Council get on and do it; rather than deliberately and knowingly exacerbate the problem. I therefore suggest that ARUP or Idp or the Councillors of EFDC reconsider this assessment, with a view to removing this site from the draft plan.

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