

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

Stakeholder ID 4788 Name Elizabeth BURN

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?

Disagree

Please explain your choice in Question 1:

There is a complete absence of any objective to conserve the natural environment and green infrastructure of the District, or acknowledge the importance of the Green Belt designation within it. The landscape character, and its inherent contribution to the natural and historic heritage of this district, is the most predominant feature of our 'green and pleasant land'. This should be an aspirational statement, but it currently needs some re-drafting ! Also, please take a look at the objectives of each of the main policies and incorporate them here !

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

Disagree

Please explain your choice in Question 2:

I support development around Harlow (subject to the comments in Question 3, below), but the distribution of housing allocated to other settlements is, in many cases, disproportionate to the organic growth of those towns and villages. More consideration should be given to the creation of either a new larger settlement to the north of the District, or to satellite development where the tenure of such is not entirely dependent on the Central Line I Underground network. Some support has been forthcoming for the concept of 'retirement villages' but these still need to be within walking distance of larger settlements, or connected by a sustainable local bus service, with adequate parking provision, appropriate to the occupancy of smaller residential units, with additional visitor spaces.

Response to the Draft Local Plan Consultation 2016 (Regulation 18)

Stakeholder ID 4788

Name Elizabeth

BURN

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

Agree

Please explain your choice in Question 3:

I generally support development around Harlow, subject to access routes to the new development areas being primarily orientated towards that town. Care needs to be taken to ensure that new, and existing, transport routes do not create a 'rat run' through Jacks Hatch, or Epping Green, to Epping, where traffic congestion is already an ongoing problem even outside peak times.

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

Epping?

Buckhurst Hill?

Loughton Broadway?

Chipping Ongar?

Loughton High Road?

Waltham Abbey?

Please explain your choice in Question 4:

No Opinion, I have chosen to concentrate on other sections of this questionnaire

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

No opinion

Please explain your choice in Question 5:

I have chosen to concentrate on other areas of this questionnaire

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

Epping (Draft Policy P 1):

Please provide reasons for your view on Epping:

Loughton (Draft Policy P 2)

Please provide reasons for your view on Loughton:

Waltham Abbey (Draft Policy P 3)

Please provide reasons for your view on Waltham Abbey:

Chipping Ongar (Draft Policy P 4)

Please provide reasons for your view on Chipping Ongar:

Buckhurst Hill (Draft Policy P 5)

Please provide reasons for your view on Buckhurst Hill:

North Weald Bassett (Draft Policy P 6)

Please provide reasons for your view on North Weald Bassett:

Chigwell (Draft Policy P 7)

Please provide reasons for your view on North Weald Bassett:

Theydon Bois (Draft Policy P 8)

No

Please provide reasons for your view on Theydon Bois:

Most residents have never been asked directly how they believe the village could evolve in the future, and the previous 'Issues and Options Consultation' (in 2012) was met with objection, primarily due to the negative impact that development on the then-proposed sites would have had on both the character of the landscape setting and on the amenity of those living in close proximity to those sites. It is, however, clear that much of what is valued most is set down in the 'Village Design Statement' which was researched, consulted upon and published, by the VDSA, nearly 4 years ago. Unfortunately, the lack of ongoing community involvement is partly why responses to this Consultation are likely again to be mostly negative, especially in relation to the unexpected suggestion of a 'quota' of 360 new dwellings, to be constructed over the plan period, which equates with an approximate 23% increase in the size of the settlement. With so much of the political focus being centred on protecting the Green Belt, very little has been done to promote the positive attributes that some additional housing could bring, and there are also no proposals to increase access to, or to create new, open green spaces or to 'enhance leisure facilities' to the benefit of the village. This part of the 'vision' seems misplaced, and it would appear that no in-depth analysis has been made of the sites specifically mentioned, nor is there any explanation as to how development to the east of the railway line (where much of the housing is said to be located) would bring forth the additional community facilities necessary to achieve this. Overall the suggested 'Vision' is too bland, especially since the 'rural setting' is not solely dependent on the proximity of Epping Forest, which is sited primarily to the west of the settlement. Only a part of the forest is accessible, through the area known as 'The Plain', although the City of London Corporation have been keen to promote (and waymark from the Tube Station) the 'Oak Trail', which utilises the public footpath to the rear of properties in Dukes Avenue, in the direction of Great Gregories Farm. This is a broadly 'circular' walk, which eventually encompasses the land adjacent to the Deer Sanctuary at the end of Coppice Row, to the far west. (More reference is made to this under the 'site allocations' below). Much of the surrounding countryside is Green Belt, a designation that has tended to constrain urban development, but it is the topography of the surrounding fields that defines the landscape setting of the village, especially along the high ridges of Little Gregories and Blunts Farm (to the north and east), where the significant slope of the fields to the north serves to enclose the urban development along the eastern edge of the settlement, such that it is not visible within

Response to the Draft Local Plan Consultation 2016 (Regulation 18)

the wider landscape until the land eventually levels out at the very end of Forest Drive, adjacent to the railway line. Where land sits within the shallow valley, and is enclosed by linear woodland, it is less visible from the higher viewpoints and therefore less conspicuous within the landscape setting. Part of the land allocated to the eastern side of the railway line falls within this definition, but only where it is sited immediately adjacent to the station and the main through-route of the Abridge Road. Understanding how the topography of the land affects the 'rural setting' should be fundamental to understanding how any new development could be incorporated into the landscape without damaging its intrinsic character. This is a balanced view, but one which may help to guide the designation of any amended Green Belt boundaries, if such are to utilise permanent landscape features beyond those of just the railway line, or the motorway. Likewise, it is the topography of the land that separates the settlement to the south from that of Debden beyond, with the undulating fields adjacent to the east of Loughton Lane dominating the horizon, where the veteran oak trees, on the ridge of the hill, punctuate the skyline. Clearly, keeping this land permanently open is key to avoiding the coalescence of the settlements. I cannot, therefore, support the suggested 'vision' - it needs to be more positive in recognising the natural environs, more dynamic in engaging support from the wider community, and more inspirational by showing how new green infrastructure could be incorporated into the layout and design of any development, rather than how to simply impose housing upon it ! ...It needs to be 'our' vision, not 'yours' !!

Proposed Sites in Theydon Bois (Draft Policy P 8): Five sites are proposed for Residential Development under Draft Policy P8 A. My main concern, in the first instance, relates to the lack of site-specific information which is provided in the Draft Local Plan, either with respect to identification of the key landscape features of each site or the type of residential development proposed within them. There has been no consultation with local residents since the 'Issues and Options Consultation' in 2012, and very little feedback from EFDC with respect to the Member Workshops regarding the anticipated site allocations as now set out in the Draft Local Plan Document. No explanation is given as to why land on the eastern side of the railway line, designated SR-0026C, does not include the actual site outlined in the Site Selection Report but, instead, an area that consists of one field and part of another. There is no acknowledgment of this in the 'Split Sites Document' (BI.2.2.) and it is clearly apparent that there is no defined boundary along part of the site as presently ascribed. This anomaly is easily recognisable, even at a first glance, to anyone who knows the village well, and has only served to exacerbate concerns raised over how any new Green Belt boundaries will be designated in the future. Given the strong objections raised to each of the three Options put forward in the 'Issues and Options Consultation' (2012), being sites allocated as THB-A, THB-B, THB-C, there was clearly going to be a need to reconsider how any future housing development could evolve within the wider parish. Since Paragraph 5.136 of the Draft Local Plan focuses on 'What you told us', I thought I'd take a look back at what I said in response to the 'Issues and Options Consultation' in 2012 ! I strongly objected to all three options, the most sensitive of which was that designated 'THB-A'. With respect to the land at Thrifts Hall Farm ('THB-C'), I said: "The site consists of a number of fields and a fuller appraisal should have been made to ascertain whether any of these have defensible boundaries to contain a lower level of development, in order to afford a more accurate assessment for the purposes of the consultation process". I also noted that "any designated development site should have an access directly via an arterial route (ie. the B172) to be considered viable"- especially if a phased development was envisaged.

On balance, I would have supported further consideration of a limited amount of development on the eastern side of the railway line, and was aware then that the one field which lies immediately adjacent to the station, could provide, by way of its ease of access from the Abridge Road, sufficient land to support a mix of housing types and tenures equivalent to an approximate 10% increase (circa. 160 new households) over the plan period. However, this Option was not shown as available then, and Option 'THB-C' outlined the whole of Thrifts Hall Farm, which would virtually have doubled the size of the village, highlighting the problem of how to delineate a defensible boundary against the type of extensive development that would significantly alter the character of the settlement. This remains the primary concern now and, without constructive input from EFDC, it is very likely that there will be a large number of objections to development on every site which is not afforded a clear, well-defined and permanent boundary. The Plan Process is unlikely to move forward successfully unless residents are offered the security of knowing that development can be contained within the boundaries of any new site and that the most sensitive green environs of the village will not be dominated by uncharacteristically high densities of modern housing. I share many of the concerns that I know this

Response to the Draft Local Plan Consultation 2016 (Regulation 18)

Consultation has raised, but I'm also aware of the need to take a pragmatic approach when faced with opposition, since many communities across this District have seen this Draft Local Plan as a 'threat' to their well-being. That said, I can't currently make the argument as to how to delineate defensible boundaries if the detailed site analysis required has not yet taken place and the Draft Local Plan does not make this a priority. Here, however, in relation to the sites allocated in Theydon Bois, are my observations, as follows: Sites Allocated for Housing Development : SR-0026B Land including the Old Foresters Site (Mostly Object) The land lies to the east and north of the village. I would be concerned as to the size of the site, which would only be accessible via the adjacent one, presently shown as SR-0026C. It is a former Sports Ground, and still appears as being of 'urban greenspace character' on the maps accompanying the 'Landscape Sensitivity Study' of 2009 (Figure: 9.4a). This use would not be inappropriate in the Green Belt, and could help to retain its openness, but there is no reference to any development here except that of housing. The outer boundary of the site is delineated by two watercourses (one of which originates from the brook adjacent to Little Gregories), which meet and, I believe, feed into the Garnish Hall Brook, farther to the north and east. Around the perimeter is a fairly dense boundary of 'linear woodland', such that the land is enclosed and not easily visible when viewed from the upper part of the Abridge Road. I note the reference in the 'Report on Site Selection: Appendix C: Settlement Proformas' (September 2016) to the opportunity to provide 'new leisure opportunities around green infrastructure' but there is no suggestion of how, or where, within the settlement this could be achieved. There is access to the adjacent countryside from the site, via the network of local footpaths, so part of the land has retained an informal recreational use. If any development were to take place here, the natural boundaries should be permanently retained to provide a buffer between the site and the wider agricultural landscape. SR-0026C Land owned by Thrifts Hall Farm (Support for further consideration) subject to concerns below This site includes an open field adjacent to the station and the Abridge Road, plus half of the adjoining field (farther east). The 'part of the field' shown has no actual boundary - it is just drawn as a line on the map ! This more distant field is thought to date from before the eighteenth century and contains three ancient oaks, which could be adversely affected by any development within this section of the site. As previously mentioned, there is no explanation as to why part of this latter field was included in the suggested designation - it is easily apparent, from any of the aerial maps, where the natural boundary lies, between the two fields. This boundary, between the first and second field (the first field being adjacent to the Abridge Road), is further delineated by 'linear woodland', which is clearly distinguishable along the line shown on the indicative map (attached), and is a permanent feature. As referenced in the 'Arup: Site Suitability Assessment' (2016), spacious, low density housing fronting the Abridge Road could retain some accord with the pattern of development within the locality but no further analysis has been drawn from that report, to assess whether this would be sufficient to integrate new housing within the wider setting. Some frontage development could screen any additional housing from the Abridge Road, but a detailed Masterplan, with a realistic trajectory, would be required for any phased development of this greenfield site, which would be likely to absorb any allocation made under SR-0228ii. Presently, without any guidance as to how new defensible boundaries could be maintained, constructive appraisal is difficult. This could be a 'preferred option', for future consideration (if any significant provision of housing is required), but too little guidance has been given within the Draft Plan, and more assurances would be needed to secure support from local residents. The community has no experience of 'Masterplanning', and strong 'Management Policies' within the New Local Plan including, in particular, those relating to the stewardship of the Green Belt, and the Design of the Built Environment, would need to be in place before any positive outcome could be envisaged. SR-0070 Land at Forest Drive (Partial Support, but only in the lower field) This site is adjacent to the eastern boundary of the village, and is a triangular field, of less than one hectare, at the end of Forest Drive. The 'Issues and Options Consultation' of 2012 identified two fields beyond the established north-eastern boundary of the settlement, under option 'THB-A'. The upper field has been removed from the allocation and, as stated within the Draft Local Plan, this was, and still is, the 'most sensitive location in landscape terms as a result of its rising topography'. As detailed in the LUC 'Green Belt Review: Stage 2' (under 043.1), the upper field rises progressively from the south to the north, forming a locally prominent hill, whose significant incline is indicative of the reason why this land was not included within the settlement boundary at the time when the estate was originally built. Any construction in this area would be clearly visible from beyond the village, especially when viewed from the Abridge Road, where such

Response to the Draft Local Plan Consultation 2016 (Regulation 18)

would appear in the surrounding Green Belt landscape as an apparently separate development, 'jutting out' and away from the urban settlement in the valley below. It is when viewed from this natural perspective (as opposed to that suggested by the map included with the 2012 Consultation document), and taking into account the contours of the site, that the original field boundaries, which delineate the settlement edge, are most clearly evident. The treeline of the mature oak trees in the hedgerow, to the west of the field further serves to separate this area from the built environment. Any built structures within this upper field would, therefore, appear highly conspicuous when viewed from the outer environs to the east, and also from the forest buffer land to the north, and along the public footpath to Great Gregories. The rising land is also visible from the internal environs of the village where, when viewed from Heath Drive, and the farther end of Dukes Avenue, the openness of the natural landscape forms part of the horizon and skyline, as part of a continuous ridge across fields situated to the east and north. Consequently, any development would be visually intrusive from both public and private viewpoints, to the severe detriment of the wider landscape setting. However, there are a number of natural landscape features that form a defensible boundary between the upper and the lower field (this smaller area now allocated as SR-0070), that have endured for well over a century as permanent elements within the landscape. The 'Arup Report: Appendix B1.4.2' (page 349-363) does not identify these (under 1.3b, 4.3, 5.1, or 6.3), although they were called out, from local knowledge, in the responses received to the 'Issues and Options Consultation' of 2012 and are clearly evident on site. Running along the fenced boundary of the properties in Dukes Avenue is a Public Footpath, that once originated at Thrifts Hall Farm, and which now forms part of the 'Oak Trail', promoted by the City of London Corporation - and a long-established watercourse, known as the Crystal Brook (as clearly delineated in the field maps of 1915, and in the landscape maps held by EFDC), which has recently been subject to a scheme of ongoing maintenance and improvement - together with a continuous, mature hedgerow, featuring a number of veteran and good specimen oak trees (hence their inclusion on the 'Oak Trail') which, whilst not currently protected, are noted in the 'Favourite Trees Project' (2007), compiled by EFDC's Landscape Team and Epping Forest Countrycare. Five of these oak trees are situated to the western side of the lower field, directly adjacent to the footpath, whilst the hedgerow that cuts across and dissects the two fields, clearly indicating the line of the watercourse below, includes two notable, and rare, elm trees of particular value. EFDC's Landscape Department are aware of the sensitivity of the site, which constitutes a strong component in the green infrastructure of this edge of settlement location, and which should be actively preserved should any development take place in the lower field. Indeed, there are new Development Management Policies proposed which would seek to offer protection to these valuable environmental assets, as set out under DM 5 A(i), DM 10 C and DM 17A and E. It is partly for this reason that I would raise concern over the high density of development suggested for this site, with an allocation given of 52 new dwellings - this being some three times the density of the adjoining settlement, and clearly not accordant with either Draft Policy SP 4 nor that of H 1A(iii). The immediate environs of this area are clearly not appropriate for designation as a 'large village centre', and this site was originally assessed as suitable for 28 dwellings. However, no indication is given as to the type of housing proposed, although this is the only site where, I believe, there was some thought given, in 2012, as to a suitable housing provision - provided that any proposed development received support from the local community. With no further consultation having taken place within the village until now, there has been no 'vision' for any future development within Theydon Bois but, with a higher than average number of older residents, many of whom could be encouraged to downsize from larger family-sized dwellings, Independent, Sheltered or Assisted Living homes may receive some public support. The village already has two Residential Care facilities, being Frank Foster House (79 rooms) and Marcris House (27 rooms) respectively, and the community is keen to retain these. By comparison, however, the Robert Daniels' Court provides only 34 sheltered living apartments, so it may be possible to supplement this housing provision - IF a new development were to be specifically designed to blend in with the vernacular style, and distinctive features, that are sympathetic to the local character, and set within the natural boundaries of the field, so affording a sense of privacy but also a connection with the adjacent green landscape. There is also a long-established permissive right of way over part of the site, and in particular over the upper fields, and this open green space is the most highly utilised of any within the parish, such that residents are likely to be strongly defensive of its retention, given the extent to which it serves to enhance the amenity of the locality, and accords with the objectives of Paragraph 81 of the NPPF. If the 'Vision' for Theydon Bois seeks to 'enhance

Response to the Draft Local Plan Consultation 2016 (Regulation 18)

leisure facilities', and promote opportunities to protect and extend the intrinsic green infrastructure adjacent to the settlement, then the preservation of the natural and permanent landscape features of this site should form an inherent part of that objective. SR-0228i Land at Theydon Bois Station Car Park (western side) (Support) Since this is a 'brownfield site' (owned by TfL), I would support some form of development within it, provided that the provision of Car Parking spaces is not adversely affected. The housing density, however, presently seems too high for this relatively small site. There are a number of flatted developments in the near vicinity, although the height of any newer development should not exceed those already in existence. High quality design would be important, using vernacular materials and traditional street elevations, to blend in with the locality. The original Station House should be retained, together with some of the existing trees around the approach leading from Forest Drive. The Balti House Indian Restaurant, which currently leases part of the site, attracts a loyal clientele, so I hope this entity could be relocated to another premises within the village, with financial assistance from the present landowner. SR-0228ii Land Adjacent to Central Line (eastern side) (As per SR-0026C) This site, also in the ownership of TfL, is 'operational', not commercial, land. It was once an allotment garden for railway workers and has no significant area of hardstanding. Development on this site was the subject of a judicial review, and plans to construct an overspill Car Park here were effectively withdrawn. Concerns remain about the influx of commuters, should a car park be built, but any housing development on this site would also look out of place, unless this was delivered in conjunction with the first field, referenced above under SR-0026C. The access road from Station Hill would need to be improved and financial investment secured for its long-term maintenance. Again, any support for further consideration of this site is unlikely to be forthcoming until a clear vision is put forward for a more sustainable level of housing over the plan period, to alleviate fears that new development adjacent to the railway line could eventually spread further northwards towards the M25. Site Allocated for Employment Opportunities in Theydon Bois SR-0552 Blunts Farm Motorway Maintenance Compound (Object) I object to the further intensification of the use of this site, which, in spite of the proximity of the motorway, is situated within a rural, Green Belt, location. The access is taken from the Coopersale Lane - a long, narrow and winding road - which is a Protected Lane. There are no public transport facilities close to the site and it is not safe to traverse this route by foot, from the Abridge Road, since there are no pavements in either direction. Therefore, any new employees would have to rely solely on motor transport, which would not make this a sustainable site for any significant increase in employment facilities. Depending on the nature of the development proposed under allocation SR-0228i, it may be possible to include a number of small commercial/retail units within the vicinity of the existing Underground Station.

Roydon (Draft Policy P 9)

Please provide reasons for your view on Roydon:

Nazeing (Draft Policy P 10)

Please provide reasons for your view on Nazeing:

Thornwood (Draft Policy P 11)

Please provide reasons for your view on Thornwood:

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

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?

Disagree

Please explain your choice in Question 7:

Whilst I refuse to be drawn into the great chicken-and-egg-debate (!), further site analysis and feasibility studies should have been carried out before the Site Selection process was narrowed down to the 'Preferred Options'. Presently the 'contingency' of reserve sites is too high and could result in the release of far too many (mostly Green Belt) sites within a shorter timescale than that of the full plan period, with a negative impact on both the existing 'hard' and 'soft' infrastructure before any anticipated CIL improvements can be effectively delivered

8. An Interim Sustainability Appraisal has been commissioned to support the Draft Local Plan. We would welcome any comments you may have on this.

No opinion

9. Do you wish to comment on any other policies in the Draft Local Plan?

The 'Draft Local Plan' clearly contains an entirely new layout, chapter and numbering system, which is not particularly easy to cross-reference with the current 'Epping Forest District Council Local Plan (1998) and Alterations (2006)'. It would have been helpful to see, under each section, which current policies are being replaced by the newer ones - which may also have assisted in ensuring that any current policies that are compliant with the NPPF have not been omitted. The complete 're-writing' of the Local Plan feels a little like 're-inventing the wheel' - minus a few spokes, with some edges that clearly need to be rounded off before it will run smoothly ! Additionally, in terms of background information and key evidence, for some policies, the relevant cross-reference with the applicable section of the NPPF is given, for others, not. With respect to current 'Planning Policy Guidance', it would have been helpful to have the issue date of these documents, so that they could be researched and cross-referenced more easily. There are, however, quite a number of useful provisions within the policies of the Current Local Plan (1998/2006) that appear to have been left out of this Draft document, not all of which are lacking in compliance with the NPPF, and many of which assist in the clarification of the relevant policy, by providing the essential vocabulary needed under which to make an assessment. The Policies Generally, the aims set out under the numbered sections of each policy (said to be the 'preferred approach'), contain positive assertions of the objectives of each policy, but the specific wording of the policy itself (under Section A, B, C etc) is often somewhat vague, and even ambiguous and, in particular, lacking in clarity as to how these objectives will be achieved by the policy. It may be preferable to start each new policy with a paragraph containing the aims and objectives, and then set out how 'this will be achieved', followed by bullet points for each aspect of the policy (which is a more traditional, but easily recognisable, format) - so that the policies read as positive assertions of what is to be accomplished by any new development. Particular Concerns in relation to the wordine; of Plan Policies (NB: Aspects relating to Chapter 5 - Places have been detailed in the answers to Question 6) H 1 Housing Mix and Accommodation Types Section E How does the Council propose to effect this policy ? How will the objective of retaining bungalows be achieved ? (And what is a 'bungalow' ? Chalet bungalows are virtually houses, aren't they ?! Would the Local Authority be able to prohibit extensions or loft conversions ?) More constructive thought on this element is still needed, but this could be a popular policy, so well worth advancing ! I have not had the opportunity to read the remaining policies in this Chapter in detail before the end of the Consultation period, or those relating to Employment Sites and Transport, but would like to focus on the 'Development Management' Policies below: DMI Habitat Protection and Improving Biodiversity "Development proposals must protect and enhance natural habitats and areas of biodiversity, and should seek to deliver net biodiversity

Response to the Draft Local Plan Consultation 2016 (Regulation 18)

gain" would appear to be the main objective of this policy! However, Sections C, D and E would seem to dilute this, allowing the 'need for', or 'benefits of' development to supersede this assertion. (Admittedly, this uneasy tension appears to be partly derived from the NPPF) - but at least there is a reference under D to "exceptional circumstances". "Irreplaceable habitats" - Shouldn't 'exceptional circumstances' also be incorporated into Section E - given the intention of the Council to 'strongly resist' detriment to 'irreplaceable habitats' ? The last sentence should probably also read "clearly outweigh the loss". This part of the policy doesn't seem to be worded strongly enough given that 'once it's gone, it's gone' ! Section F - Shouldn't this require something more than just 'provide survey information' ? How would 'Protected Species' etc be protected ? What happens if the 'potential impact' is detrimental ? How would the main objective, above, be fulfilled by this policy ?

DM2 Landscape Character and Ancient Landscapes There are references under 'The Issue' to veteran (and ancient) trees, but no specific inclusion of these in the policies. Where would I find policies equivalent to those contained under LL7 to LL 13 inclusive (of the current Local Plan) ? DM 2 may set out the objective, but some guidance on restrictions is needed in order to 'preserve' and 'enhance' the environment. Aspects relating to 'Land Management' (stewardship), under LL 1 and LL2 appear to have been lost from EFDC's current plan, as has the need for rural development (and agricultural/forestry-related development) to respect the visual sensitivity of the landscape. Current policies, recognising the sensitivity to 'edge of settlement' locations (LL3) are not carried over, in spite of the concerns called out under 'What you told us' (4.103). Current policy LL3 is a particularly important one, since many 'edge of settlement' locations mark the transition from the urban built environment to the countryside (or forest). Development within these areas is particularly sensitive, given the green environs surrounding many of our settlements, and decisions by the Planning Inspectorate have recognised this. I, therefore, strongly object to the loss of the abovementioned policies (as contained within LL7-LL 13). DM 2 A and B would, therefore, benefit from further detail in order to 'protect' and 'enhance' the Landscape Character, with more emphasis on how this is to be achieved. DM 3 Epping Forest and the Lee Valley SPA I support this new policy ! Should there be some detail as to 'restrictions' placed on development that could adversely affect either of these two areas ? The policy states that there is a need to 'enhance' the local environment, but not how it will be 'protected' ? DM 4 Suitable Accessible Natural Green Space and Corridors I support this new policy ! However, I'm not sure how it will be achieved ? What is the meaning of 'natural' - does it relate specifically to new 'green space' on the edge of settlements ? Who will manage the 'new green spaces' and how will these be retained for future generations ? The ongoing management would appear to need the support of relevant stakeholders (ie. City of London Corporation). Is any further guidance intended (a Supplementary Planning Document) ? DM 5 Green Infrastructure: Design of Development I strongly support this new policy ! Please would it be possible to add to DM 5 A (i) reference to 'Protected Lanes' (and 'quiet lanes'), as these are heritage assets of the natural environment. (Coopersale Lane in Theydon Bois is a Protected Lane). I believe this conservation policy has been in place in Essex since the 1970s. There is reference to 'the provision and/or retention of trees ... within built up areas', under DM 5 A (iv) but this is not as clear, nor as effective, as the provisions currently set out under present policies LL7 to LL 12. I would like to see this policy amended to afford more weight to those aspects currently contained within the 'LL' policies of the current Local Plan. References under DM 5 B (iii) to 'appropriate' and 'adequate' do not appear commensurate with the objectives of the policy. More positive/assertive wording would be helpful. DM 6 Designated and Undesignated Open Spaces DM 6 B: I would raise concern that there appears to be no criteria under which to assess the impact of the loss (especially to the Local Community). Simply stating that development will only be 'permitted if it does not result in the total loss of open space' may not result in any useful part of it remaining ! Visual amenity and practical use are both equally important to the well-being of local residents and this is simply not afforded sufficient weight in this policy. There are many different 'leisure' uses of such spaces: some casual and occasional, some sport and fitness orientated, some organised, and some involving the wider community in publically-held events. The complex function of such spaces requires detailed analysis when setting down assessment criteria. The application of policy DM 6 C would not be sufficient to mitigate against any loss 'permitted' under DM 6 B. As before, 'appropriate' is a little vague - a higher level of achievement should be factored into the policy. There is also a clear need for more specific assessment criteria, and a greater level of protection for long-established open spaces (whether or not they are currently designated). This is particularly so in areas with high levels of 'affordable' (ie. social) housing, including, in particular, within the

Response to the Draft Local Plan Consultation 2016 (Regulation 18)

Debden estate, where the open green spaces form an intrinsic part of the townscape setting. This policy is lightweight by comparison to that which seeks to preserve and enhance Green Infrastructure, and runs the risk of being seen in the context of the 'Green-Belt-versus-Urban-Green- Space' argument that has somewhat marred this Consultation process at District Committee level. I would refer back to the first three criteria of the Draft Vision for the District, and to Paragraph 74 of the NPPF, to ensure that preservation and enhancement of Open Spaces (particularly those in, or adjacent to, urban areas) is not afforded less weight than the preservation and enhancement of the landscape setting of the more rural villages. I am fortunate to live in a village characterised by the beauty of its landscape setting, but the open green spaces of the more densely-populated Council-owned estates are equally important to the well-being of residents there. 'I ..

OM 7 Heritage Assets DM 7 A This opening policy should be more assertive of the need to protect and enhance. 'Harm' to a heritage asset is afforded substantial weight in Case Law, such that it may prohibit development. The wording of DM 7 A seems almost to accept a level of harm. What action can be taken under the policy should the 'statement' (and the development) prove insufficient to meet the criteria under (i), (ii), (iii) ? The protection of Heritage Assets (as with Green Belt designation) allows for the positive assertion of policy by specifically restricting any harm that could be caused by development. (The remaining sections of the policy (B - G) however, better reflect the required emphasis). OM 9 High Quality Design The basic premise of this policy is acceptable, but the actual 'Design Standards', under DM 9 F are rather sparse, and not particularly succinct (what are "active frontages to the public realm" ? Why no reference to building heights, roof-line, proportion, orientation, siting etc, which are all mentioned in the Current Local Plan ?).

Additionally, some important elements of the current 'DBE' policies have been lost - including DBE4: Design in the Green Belt (which is particularly important to avoid the loss of vernacular forms and detailing which enhance the rural character and keep it from becoming 'too suburban' in design), and DBE6, with respect to the siting of vehicle parking spaces, such that they don't dominate the streetscene (a policy that has been supported by the Planning Inspectorate at Appeal). Personally, I think this section would benefit from a re-write. - So, here's one I thought was better (!), being an extract from the 'Design Policies' of another authority. Note the assertive stance ... "All development must: 1) Respect and enhance the character and local context and make a positive contribution in terms of a) Architectural style, use of materials, detailed design features and construction methods. Innovative design and construction solutions will be considered where appropriate. b) Height, size, scale, form, massing and proportion c) Landscape setting, townscape setting and skylines (I would probably have added 'streetscenes', rather than skylines) d) Layout, orientation, and density" ... etc ... (Extracted from Maldon District's Pre-Submission Local Development Plan) I also think there would seem to be too much intended reliance on Design Codes and Masterplans (to be prepared by the developer !), which will greatly increase the time and expense of the development process. In spite of the promotion of such by EFDC's Consultants, I doubt that most District Councillors know what a Design Review Panel really is, and it is unlikely to be 'independent' if it is made up from many of the locally well-known architects and agents. Just how many more reams of 'Design and Access Statements' do we all need to plough through, I wonder ?!

DM 9 G Landscaping What is meant by 'respond to' ? What is the objective here ? Section (vi): this was probably unintentional, but 'maximise the use of permeable surfaces' could be taken to mean 'permeable hardstandings' (often used to describe block pavers, which are rarely 'porous' due to the compaction of Essex clay soil) rather than, I presume, truly permeable surfaces for planting ! This needs clarifying. DM 9 J Privacy and Amenity How does 'good design' translate into just 'adequate' ? Please revise, to raise the expectation higher, especially when applied to new residential dwellings: private and public amenity should be given a greater priority than this. I would draw on the responses under 4.151 - "concern was expressed that higher densities result in 'town cramming' and reduced areas of open space and public realm to contribute to the character and quality of the built environment", with which I concur. DM 9 K I strongly support the references made to Neighbourhood Plans and Village Design Statements. Theydon Bois has a Village Design Statement, which represented two years of consultation, analysis, compilation and, finally, publication by the Village Design Statement Association, and the Parish Council has been keen to see this endorsed by the District Council. It also contains details of the popular Theydon Bois 'Dark Skies Policy'. EFDC, however, has not presently given sufficient time, promotion or support to Neighbourhood Plans, and the only two in existence at the time of this consultation (Moreton, Bobbingworth and the Lavers, and Chigwell respectively) have virtually bitten the dust before they got off the

Response to the Draft Local Plan Consultation 2016 (Regulation 18)

ground ! (Dare I mention this ?!). DM IO Housing Design and Quality Again, some elements of the current policy (DBEIO) have been lost under DMIO E, including the reference to extensions that will be 'required to complement and enhance the existing building and the streetscene'. 'Proportion' is also particularly important to this policy, and is fundamental to good architectural practice. (Note, this is not the same as size !). It is also important to consider the design elements associated with different housing types, and there is nothing in this policy with respect to the construction of flatted accommodation, or the sub-division of properties to create apartments (previously DBE 11). Likewise, something needs to be considered here for the design and layout of new 'bungalows', as one form of 'smaller' dwelling unit, and the provision of both 'independent living' units and 'dependent care' units. How does the Council consider it would be possible to retain these units for future (older, or physically less-able) generations ? Additionally, I would wish to see a new policy on Residential Annexes incorporated here, to ensure a flexible approach to changing housing needs. However, the amenity of adjacent neighbours obviously needs to be protected, together with a restriction on the size of such proposals (one bedroom, intended for dependent relatives, with shared living facilities), adjacent or adjoining the main dwelling, with a sole access within a single planning unit. Within Green Belt locations, we currently see far too many proposals for large, self-contained, annexes, sited some distance from the host dwelling, which are clearly not going to endure in that use ! Other Local Authorities have long since had such policies, and I believe that EFDC should take a more proactive stance in the management of its 'housing stock', especially since so much time and effort (and money !) has gone into assessing this aspect, as part of the Evidence Base. DM 12 Subterranean, basement development and lightwells (Object) It is good to see new policies on Subterranean and Basement Development, but I strongly disagree with the suggestion that these could extend under the 'garden area' by up to 50% (DM 12 B ii), which is far too excessive. I would suggest that these should not extend by more than 3 metres from the external wall of the property or contain habitable rooms. Their construction tends to be contentious. Generally, I support more emphasis on eco-friendly strategies (DM19 - 21), although some of these relate better to building regulations (and would, previously, have been covered, in part, under the former 'Code for Sustainable Homes'). SP 1 Presumption in Favour of Sustainable Development Obviously a pre-requisite in any new Local Plan ! Please note, however, the exceptions in Footnote 9 of Paragraph 14 of the NPPF, in particular those relating to Sites of Special Scientific Interest (Epping Forest), land designated as Green Belt and Local Green Space - which probably covers most of the District, actually !! SP 2 Spatial Development Strategy 2011 - 2033 Section A directly relates to the number of dwellings proposed in Theydon Bois, but I understand that site visits, feasibility studies and infrastructure provision assessments have yet to be undertaken, so the suggested figure of 360 new residential properties is somewhat speculative - and has led to a considerable number of objections within the village. This equates with a 23% increase over the Plan Period and is felt to be excessive. The level of 'contingency' currently estimated is extremely high (para. 3.62), particularly given that market housing in Theydon Bois is likely to be considered highly desirable and, with a larger area of land now available on the eastern side of the railway line, easily deliverable. However, any extensive development is likely to impact negatively on local facilities, including health service provision and primary school places, and the capacity of the Central Line, all of which have not been fully quantified within this Draft Local Plan. SP3 Strategic Allocation around Harlow I generally support development around Harlow, subject to access routes to the new development areas being primarily orientated towards that town. Care needs to be taken to ensure that new, and existing, transport routes do not create a 'rat run' through Jacks Hatch, or Epping Green, to Epping, where traffic congestion is already an ongoing problem even outside peak times. SP4 Place Shaping Generally speaking, I support the aspirations set out under SP 4 A. However, the provisions detailed under SP 4 B seem likely to contradict the requirements of the first Section of the policy ! High density development is not commensurate with the character of many of the existing villages, especially on the edge of these settlements, which are invariably bordered by open countryside/Green Belt land. It would seem likely that further assessment will be needed as to what constitutes a 'large village centre'. A zone-ing system may help, but would require the assistance of the Parish Council to determine this. Theydon Bois has been willing to accept flatted development adjacent to the small parade of shops and Tube station (and, to some degree, around the village green) but not generally further within the residential areas. This aspect could be clarified in a Neighbourhood Plan, together with more bespoke Parking Standards, for new development both within, and outside, the central 'zone'. SP5 Green Belt and District Open Land SP

Response to the Draft Local Plan Consultation 2016 (Regulation 18)

5A: Very strong objection to the omission of locally-specific Green Belt Policies. This is a major criticism of this Draft Local Plan. I'm aware of some of the current thinking on modern, so-called 'shorter', plan-making - primarily based around the suggestion that local plans should be, first and foremost, strategic documents, and should not unnecessarily repeat 'policies' already set out in the NPPF - but I'm not convinced that EFDC's New Local Plan should simply default to the provisions of 'Chapter 9: Protecting Green Belt Land' of the NPPF without some further explanation and detail. Most of the Green Belt Policies of our Current Local Plan (of 1998, with Alterations of 2006) have already been found to be compliant with those of the NPPF (as advised to the 'Local Plan Cabinet Committee' by EFDC's Counsel, Mark Beard, in spring 2013) and many of these include a further degree of detail to assist in the determination of planning applications. However, on p.96 of the Draft Local Plan it states ... "There are no locally specific matters which would warrant Green Belt policies over and above Draft Policy SP 5" ... Given that this District will remain approximately 90% Green Belt, I would be of the view that we all (applicants, developers, amenity groups, Parish/Town Councillors, District Councillors and Planning Officers and Practitioners) need clearly defined management policies, that are both compliant with the constraints that this designation affords and the three main tenets of sustainable development (economic, social and environmental) ! If development within the Green Belt is 'harmful by definition' then any development that IS allowed - either because it falls into one of the limited number of exceptions, by being then 'not inappropriate', or by way of 'very special circumstances' - needs to be assertively 'managed' within clearly-defined criteria. I also believe that I am correct in saying that it falls within the remit of the Local Authority to construct policies which, whilst being compliant with those of the NPPF, may add more specific criteria, in order to establish a detailed, informed and consistent policy document to assist Officers, and Councillors, when determining applications at a local level. A Local Plan is also, in effect, a 'working document' ie. it needs to be clear, concise and transparent to all those who wish to utilise the planning process - including those deemed to be stakeholders and/or consultees. It is supposed to provide policies which are readily 'accessible', even by those who are not planning practitioners and, in particular, to those who are applicants, agents and interested parties. I find myself looking at this Draft Policy SP 5 and thinking - Wot, 'No' policies?! By comparison, I took a look Woking Borough Council's Green Belt Policies (which were formally adopted in October 2016, as part of the 'Woking 2027' Local Plan), and those of Brentwood District Council (from their Draft Local Plan, which goes to Examination in Public shortly, there being 89% Green Belt within that District) - and which, I think, seem fairly familiar and similar to EFDC's existing policies (under GB1 - GB19 inclusive). The latter is a neighbouring Council to Epping Forest District. Just for clarity, Green Belt policies within a Local Plan primarily set out the following: (1) Those uses which are 'not inappropriate' (being agriculture, horticulture or forestry), or the 'replacement of existing buildings' (if in the same use) and 'extensions to buildings' (again, if in the same use). (See NPPF, Para.89 onwards). (2) With respect to the 'replacement of buildings', there would generally be criteria included with respect to the extent (if any) that they may be replaced by a materially larger building - with some indication as to how this would be assessed (in EFDC's current Local Plan the focus has tended to be on 'volume', but those of a significantly greater footprint and/or height have also been deemed 'inappropriate', since such increases would impact negatively on the 'openness' of the Green Belt). (3) Increases in the size of residential curtilages have also been resisted, as these, along with the addition of garden paraphernalia, tend to lead to a greater 'urbanisation' of the rural landscape. (4) With respect to 'extensions to residential buildings' it is not uncommon to see some indication as to what would be deemed to 'result in disproportionate additions' - and this is, again, often interpreted in terms of volume, footprint, height and bulk, especially when the resulting structure would also be visually conspicuous. (5) An understanding of how 'openness' is affected by both the presence of built form (even if not visible) and those elements which are 'conspicuous', both from within the Green Belt and from the immediate environs, has always been essential to the understanding of why such 'buildings' or 'built structures' are deemed 'harmful' to the Green Belt - and is probably the aspect that most needs explanation with respect to the majority of planning applications, received by any Local Authority, in relation to areas designated as Green Belt. Additionally, there are two areas in which EFDC's Current Local Plan has, for some time been 'absent, silent and not up-to-date', these being: a) Para. 89 "limited infilling in villages" etc [For which, and as an aside, I found a useful definition, taken from Guildford Borough Council's new Local Plan - which goes to Examination in Public in December 2016: "For the purposes of this policy, limited infilling is considered to be

Response to the Draft Local Plan Consultation 2016 (Regulation 18)

the development of a small gap in an otherwise continuous built-up frontage. or the small-scale re-development of existing properties within such a frontage. It also includes infilling of small gaps within built development. It should be appropriate to the scale of the locality and not have an adverse impact on the character of the countryside or the local environment". (Guildford Borough Council : Policy P2 - 4.3.26)]. and 10/11 b) Para. 89 "the partial or complete redevelopment of previously developed sites ... which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development". Without at least some criteria set out in policy, the evaluation can become highly subjective - which leads to concerns over 'inconsistency' in the public mind. In conclusion, the main concern that I would raise, in the context of an apparent 'lack' of Green Belt policies within EFDC's proposed Draft Local Plan, comes primarily from the overriding need to define and delineate how Green Belt policy will be applied at a local level, with clear, transparent and practical guidance on the relevant criteria to be utilised by the decision-maker when weighing the respective merits of each application during the determination process. SP 5 B District Open Land The concept of District Open Land is an interesting one, and I am inclined to support this new policy. It will, however, need a more succinct definition and clear assessment criteria. More thought needs to be given to the land management and stewardship of such sites, which will also need to be enduring beyond the next Local Plan period. The creation of buffer zones between the urban environment and the wider open countryside seems to be reminiscent of the 'garden suburb' concept - perhaps ! SP 6 The Natural Environment, Landscape Character and Green Infrastructure Generally, I support this policy - but please be aware that much of the natural environment in this District is also, in effect, protected by its designation as Green Belt land. Policies under this section would therefore tend to add a further element to the enhancement and sustainability of the countryside, and the rural economy, and should, to some degree, complement those of local Green Belt Policy (another reason, I believe, for including more detailed policies under SP5A). Conclusion Finally, I would like to thank you for taking the time to read this; it has been a mammoth task - but I hope that, in some way at least, some of it may be helpful. If I'd added any more it would have been longer than the Draft Local Plan itself ! - So much for 'shorter' consultation responses, I guess !!

Response to the Draft Local Plan Consultation 2016 (Regulation 18)