

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

Stakeholder ID	4570	Name	Tricia Moxey (CPRE)	Campaign to Protect Rural England
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Letter or Email Response:

I appreciate the amount of time and effort which has been spent on preparing this Draft Local Plan, but it seems that this much more required to ensure that it will reach a stage where it can be adopted. The whole Plan is founded on the Strategic Housing Market Assessment (SHMA), prepared by Consultants ORS. This is the fundamental building block which forecasts housing need and underpins Epping Forest's forward planning. This SHMA has been severely criticised by many others and a considerable amount of time and effort has been expended in attempting to make any sense of these figures. Others have submitted criticisms listing their concerns and I would concur with their findings. I am personally saddened that those who prepared the document decided to use a non-local photograph for the cover of this important document. This sends out all the wrong signals to the local community. In an area noted for its attractive scenery surely it should have been possible to use a local photograph which encapsulated what is special about our area? The scale of the maps provided within the Draft Local Plan documents and at the public meetings made it difficult to judge the exact impact of some of the proposals and many who wished to respond in a coherent manner were unable to obtain more accurate information. The strapline Epping Forest: a 'great place to live, work, study and do business' includes tackling the problems of finding space for new housing and employment sites as well as protecting the green and unique character of our district for future generations to enjoy. The Draft Vision for the District states that by 2033 the Epping Forest District will be a place where:

- Residents continue to enjoy a good quality of life;
- New homes of an appropriate mix of sizes, types and tenures to meet local needs have been provided and well integrated communities created;
- Development respects the attributes of the different towns and villages;
- Development needs will be met in the most sustainable locations;
- Epping Forest will be conserved and enhanced;
- The recreational aims of Lee Valley Regional Park are supported;
- A more sustainable local economy including tourism, aviation, research and development, food production will be developed;
- A distinctive and attractive network of town and village centres will have been maintained;
- Access to places by public transport, walking and cycling will be promoted; and
- Significant residential development will be located near Harlow to support the economic regeneration of the town.

However, in the Epping Forest District Council's Draft Local Plan the proposal to build in excess of 9,000 homes within the Metropolitan Green Belt which equates to approximately 80% of its total housing target. Claiming that this amounts to a loss of only 1.5% of Green Belt land, these sites are of strategic importance to the whole of Metropolitan Green Belt within its area. The proposed sites are currently either agricultural land (the largest tranche) or playing fields or former sports grounds. A number are close to Epping Forest or its Buffer Lands. Some of these sites provide a range of recreational and leisure activities, giving access for horse riders, or walkers to some stunning

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countryside with wonderful expansive views. Several significant footpaths into open countryside will be effected including the start of the Essex Way Long Distance Footpath. The opinion of CPREssex is that This Draft Local Plan is unsound because it is not sustainable, it is not justified or consistent with National Policy and therefore it strongly objects to the proposals to release Green Belt for housing and employment on the following grounds:

- Proposals to release large areas of Green Belt for housing developments are inconsistent with the NPPF and with stated Government policy, as stated by the Secretary of State for Communities and Local Government.
- The Green Belt sites proposed for housing meet the requirements as set out in the paragraphs on Green Belt purposes as set out in the NPPF and their removal would compromise the integrity of the London Metropolitan Green Belt. The NPPF outlines twelve core principles of the planning system, the one of particular relevance to Green Belt is: • "To take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it." (NPPF, para 17.)
- The current Government policy is to protect Green Belts and any changes need to be carefully considered and applied only in very special circumstances.
- The aim of Green Belt policy is to: "prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence." (NPPF, para 79.)
- The NPPF sets out five purposes of the Green Belt, namely:
 - to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The majority of sites within the Green Belt have been put forward by potential developers. This is not surprising as at 2015 valuation such land is worth £5,225,000 per hectare with planning consent. In their own assessment of its green belt land, EFDC concludes that the Green Belt sites proposed for development meet Green Belt purposes as set out in the NPPF. They therefore are admitting that the inclusion of these sites is contrary to national policy, thus admitting that their local plan is inconsistent with sustainable development as set out in the Framework. To endorse this argument on sustainability, in their own Green Belt Stage One Assessment carried out in June 2015, EFDC, parcelled out segments of green belt land and scored it on how it met the five purposes of the Green Belt. It appears that some Local Planning Authorities are misinterpreting NPPF paragraph 80. Any of the five purposes defines a Green Belt and a simple scoring system, as used by some authorities, are likely to be challenged. Over 70% of the Green Belt Parcels in EFDC were scored a maximum of 5 in meeting the third Green Belt purpose to 'Assist in safeguarding the countryside from encroachment'. This should be enough to give these parcels protection under the NPPF. Even when these Green Belt parcels were broken down into smaller segments and re-assessed in the Stage Two Assessment, over 50% of all segments were rated as strongly meeting Green Belt purposes and over 20% were rated as relatively strongly. Consequently, the removal of these sites was assessed as posing either a very high or high level of harm. It is quite clear that the harm of removing Green Belt land which strongly meet Green Belt criteria in paragraph 80 of the NPPF, considerably outweighs any benefits. The proposed development around Harlow undermines the Green Belt's purpose of checking unrestricted urban sprawl. EFDC's Background Paper on Green Belt and District Open Land states: 'The scale of growth envisaged in and around Harlow will necessitate the delivery of significant elements of new infrastructure, which will be located within the Green Belt in Epping Forest District.' However, these proposals within the Draft Local Plan actively encourages development. I fail to see how EFDC has proved that the benefit of releasing land within the Metropolitan Green Belt area outweighs the harm. The strategic importance of these sites for the whole of the Metropolitan Green Belt, is extensive. It includes removing legitimate Green Belt which exists to prevent urban sprawl and therefore ensure that towns within the District do not merge with one another, so safeguarding the countryside from encroachment, for recreational uses, environmental, health, amenity and social value. Paragraph 44 of The Planning Practice Guidance states that: 'The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies ... Such policies include ... land designated as Green Belt'.

<http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/stage-5-final-evidence-base/> EFDC in preparing its Draft Local Plan, has failed to take account of the significant harm of removing Green Belt for housing, despite there being a clear environmental and social impact for both the residents of EFDC as well as neighbouring authorities. The Green Belt assessment concluded that the clear majority of EFDC's Green Belt performs strongly and its removal would cause considerable harm. In addition, the methodology used in the second stage of the Green Belt Assessment whereby the parcels from Stage One have been

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broken up undermines the integrity of the Green Belt by chipping away at strongly performing parcels and therefore leaving them less defensible against future development. The Draft Local Plan proposes significant growth for many of its small towns and villages for example: • North Weald Bassett, 1578 housing units; • Epping, 1060 units; • Waltham Abbey, 674 units; • Chipping Ongar, 589; • Theydon Bois, 325 and • Nazeing, 284. The proposals in many of these locations are for houses within the Green Belt, spreading the urban footprint into productive countryside. • Parcels of land round Epping SR 0071, extends the town into historic landscape within Green Belt SR 0132Ci breaches the natural boundary of the Rd and extends towards the Conservation area of Copped Hall with historic landscape. SR -208 extends towards protected area of Epping Forest. SR 0153 extends into Green Belt, on farmland and start of Essex Way - fantastic views. SR 0069/33SR 0113B SR0069 are within the Green Belt and on agricultural land. • Parcels of land round Ongar SR 0067i SR 0120 St 0185 SR 0184 SR 0390 are all within the Green Belt. • Parcels of land Round Waltham Abbey SR 0099 SR0104 land within the Green Belt. (Changes to Green Belt boundary to the south of Waltham Abbey are to tidy up where development has already taken place). • Parcels of land round North Weald SR 0153 A SR 0039 massive take from Green Belt, currently land which is undeveloped and useful for absorbing rainfall as this is part of the catchment of the Cripsey Brook - slows down potential for flooding downstream. • Parcel of land at Thornwood SR -0149 an extension into the existing Green Belt - temptation to move it further northwards in the future? • Parcel of land at Theydon Bois SR-0026 -which breaches the definitive boundary of the Central Line on the edge of the settlement. • Small piece of Green Belt Land at site SR-0176 in Buckhurst Hill. The loss of even 1.5% of Green Belt land means a reduction of potentially good agricultural and which should be retained to make a contribution to future food security. Undeveloped land provides more than just the chance of growing food. It is part of the green infrastructure of the district and supplies the local community with other benefits. The grassed agricultural lands of the Green Belt absorb an estimated 62 tonnes of carbon per annum. Green spaces and playing fields are important too and the proposals to build on those located in Loughton, Epping, Chigwell and Coopersale should be firmly resisted. The supporting evidence for the value of green spaces is the Appendix at the end of this letter. In all of these locations, this is an excessive amount of new building, which will radically alter the current communities, placing considerable strain on the local infrastructure which is in many places is already overstretched. Details of these are set out in Chapter 6 of the Draft Local Plan, Infrastructure and Delivery, which highlights that the areas earmarked for growth are already at capacity for example in relation to health, education and sewage. Water supply is stretched, the installation of water meters is an indication of the concerns over current levels of supply as well as an attempt to curtail usage. There is no clear infrastructure plan to support development around small towns and no figures are available for the required costs. The Plan risks putting further pressure on the green infrastructure and is not convincing in terms of careful traffic modelling. The proposed increases in population for just for Epping, North Weald and Ongar will present serious problems related to increased traffic movements as the existing narrow roads within each of these settlements are already seriously congested. The proposed development East of Harlow (site SP 3.4) around Junction 7a risks opening a new traffic corridor towards Epping and the M25 and is likely to bring additional traffic through Ongar and along the A414. Green Belt should have been considered as a constraint when setting housing targets, but this has not happened. The government has made it clear that demand for housing is unlikely to be accepted as the exceptional circumstances needed to justify changing Green Belt boundaries. EFDC is clearly justifying the release of Green Belt by arguing that it is needed for housing. Guidance also states that councils should take account of constraints like Green Belt when establishing housing targets. However, instead of taking account the constraint it faces that it should not seek to release some its Green Belt land, the Council is striving to not only meet its own housing targets but also to contribute to those of Harlow District Council. In paragraph 13.3 of the Background Paper on Green Belt and District Open Land, EFDC justifies releasing Green Belt land with the following statement: "The Council considers that the need to promote sustainable patterns of development to meet objectively assessed needs for development in the District over the Plan period requires some alteration of Green Belt boundaries and that failing to deliver development to meet those needs would not contribute to the achievement of sustainable development in accordance with national planning policy. Therefore, the Council considers that exceptional circumstances have been demonstrated to alter existing Green Belt boundaries as proposed in the Draft Local Plan." This is in direct contrast to the Secretary of State statement that Green Belt should be 'absolutely sacrosanct' and ministers' clarifications in letters to MPs, for example, "we have been repeatedly clear that demand for housing alone will not change green belt boundaries" referring directly to the Local Plan preparation process. [Letter from Brandon Lewis to MPs 7 June 2016]. Moreover, Paragraph 45 of the Planning Practice Guidance clearly states that councils should take account of policies such as the Green Belt which indicate development should be restricted. Air pollution Carbon emissions: On a per capita basis, Epping Forest has a high

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level of CO2 emissions, mainly because of the M11 and M25 motorways, but this pollution spreads out across the district. Current air pollution in Ongar is in excess of EU regulation. Pollution will rise with the inevitable increase in the number of vehicles using local roads. Noise, vibration and air pollution is intensified in Ongar's historic high street due its narrow and restrictive nature. This has an impact on residents living in the High Street, pedestrians and shoppers and also has the potential to further damage Ongar's historic buildings in this conservation area. In November 2007 Epping Forest District Council signed the Nottingham Declaration on Climate Change. The declaration is a tool to secure commitment from UK Councils to tackle the causes and effects of climate change. Pollution has a detrimental impacts on vegetation, especially the trees which make the area so special. In addition there are concerns about the long term health implications of this level of traffic induced pollution on the wellbeing of people, especially children, many of whom have persistent coughs throughout each winter due to inhalation of fine diesel particles. There are alarming stats for this and at long last those in authority are now aware of the problem and hopefully will start to take appropriate action. In discussions with local Cllrs I have been assured that as the land is precious they wish to make the best use of it and are looking to increase the density of urban dwellings and that they wish to see quality homes being provided as a result of the new Local Plan. This is supported by statements such as Policy SP4 "Provide high quality and imaginatively designed homes . . . "Paragraph 4.153 "The Council is keen to ensure that the next generation of development in the district is of a quality deserving of its location." And of course the national guidelines back this up Paragraph 4.149 "The NPPF encourages good design . . . " However, this is something which must be incorporated into the Plan and monitored to ensure that it will apply to all locations and to the whole of the buildings involved. I understand that Review panels are being used by many of the London Boroughs to help in the quality of design of buildings. It would appear that EFDC does not currently have an in-house architect to guide their decisions and it might be a good idea to include something about design guide lines in the plan. If that is so, then the developers will call the tune which is not an ideal situation. Therefore the setting up a Design Review Panel could be of great benefit in the consideration of large or contentious proposals, such as those for most of the developments. With the proposed increase in dwelling units the pressure on Epping Forest will be much increased making the task of conserving it much harder. The Lee Valley Regional Park will be able to provide recreational facilities, but in all recreational spaces, more funding will be required to maintain them to allow for increased usage. Several of the parishes and towns within the Epping Forest are have announced their intention to produce their own Neighbourhood Plans. This can bring together a number of ideas which have been talked about over the years which are in fact missing from the Draft Local Plan. This is to be welcomed as in other parts of Essex this is working well to achieve a reasonable consensus with communities as to how they should develop in the future to accommodate the changing needs of the local residents. CPR Essex would like to suggest the following modifications: • Revise housing targets taking into account the restriction that the continued preservation of the Green Belt requires. • Remove all Green Belt site allocations from the Draft Local Plan. I appreciate that this is going to present some serious rethinking of the plan in its present form and I look forward to seeing the revision to the plan sometime next year. On final thought, it would be wise for the Government to give serious thought to means of reinvigorating other parts of the country which have fewer problems of rising house prices. Areas where people can enjoy a good work life balance without extreme commuting and local authorities are not struggling to try to meet the demands on their restricted supply of land. Some sensible people are taking the plunge and are moving away from the south east - this should be encouraged!

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