

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

Stakeholder ID 2740 Name Daniel Shurville

Method Survey

Date

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### Survey Response:

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

Strongly disagree

Please explain your choice in Question 1:

Part of the vision says about protecting the Epping Forest District Green Belt, yet proposals include building on it. Whether the percentage is only small or not is irrelevant, as time after time, a small percentage amounts to an increasing amount and gradual erosion. The green belt was created for a reason and as far as I know should only be built on in exceptional circumstances. Here, I do not see any exceptional circumstances that requires building on the green belt. I am not opposed to any development in Epping and recognise that development is sometimes required, but it has to be on a more equal footing with the rest of the district (the proposed required number of dwellings proposed seems to disproportionately lie with Epping) and fit in to the already established environment. Also, to be able to agree to the plan, further information is needed in the document as to the proposed development. In some proposals, a small size plot appears to support a significant sized development, yet a larger plot will support less dwellings. If further development is required, taking into account local infrastructure, surroundings, heritage etc., the development should be maximised, i.e. not just a few luxury houses in a large plot which would accommodate very few, but take advantage of the potential of the site to meet the requirements put on the council to provide the requisite number of dwellings. Additionally, the plan contains little information on who will fund infrastructure and how this will be implemented to support an increased population in the small Epping Town. Traffic is a problem in the town and the high street is often congested, whether it is rush hour or the weekend, with vehicles backed up through the town and out to either side of Epping, out towards (and past) the junction at High Road and Theydon Road, also at Woodricken Hill, which is a key link from the M25 to Epping. There is little which can be done to alleviate congestion in the town due to the protected Epping Forest surrounding it and existing building etc.

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

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

**Strongly disagree**

Please explain your choice in Question 2:

I do not agree since Epping, North Weald Bassett and Theydon seem to be required to support more than their fair share of development in the district. More use could be made of already previously developed areas. In Epping, for example, St Johns Road, could be utilised to support additional dwellings, rather than any "release of green belt land" which is not acceptable. Building on green belt is not a release of the land but destruction which goes against the purpose of imposing the land as green belt. Harlow appears to wish to grow, it should do this within it's own confines by maximising development of sites outside the confines of the green belt. The building on green belt conflicts with the purpose and design of land being designated as green belt and conflicts with Minister's statements on that land. EFDC does not have to accept the proposed number of dwellings required to be developed. They can assess the requirements and available infrastructure and propose that less be built.

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

**Strongly disagree**

Please explain your choice in Question 3:

For any additional housing estates in the district they should ALL be given the care and infrastructure which appears proposed only for sites near Harlow. The plan does not adequately address infrastructure requirements for sites, such as in Epping, which makes reference to needing investigation and to address additional infrastructure but without actually addressing it. Again, any development on green belt land is objected to for the reasons already described in previous questions.

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

Epping?

Yes

Buckhurst Hill?

No opinion

Loughton Broadway?

No opinion

Chipping Ongar?

No opinion

Loughton High Road?

No opinion

Waltham Abbey?

No opinion

Please explain your choice in Question 4:

I cannot comment on all the areas, but in respect of the proposed shopping area in Epping, I do not disagree with the proposals, provided consideration is given to the existing provisions already on the High Street and that they do not destroy the character of the High street which is a significant characteristic of Epping Town. The proposed area should complement the already existing provision rather than take away from it and should fit in with the character of Epping Town. Thought must be made as to people being able to travel to the area and make use of the facilities, without which that area will just be underused and become derelict.

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

Strongly disagree

Please explain your choice in Question 5:

I would disagree as building on existing employment sites in favour of residential development, seems to go against the stated policy of promoting employment development and job creation / expansion of existing business.

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

Epping (Draft Policy P 1):

No

Please provide reasons for your view on Epping:

Without further details on the proposed developments and proper investigation and proposals for infrastructure to support future development I cannot agree with any of the proposed areas. This is not available in the draft plan, although referred to on a number of occasions, it is not followed up. Without more detailed information it is impossible to tell whether land is being effectively used. As per my comments on question 1, it makes little sense to be taking valuable land to build just a few luxury houses when better use of the land could be made to ensure the council's requirements for number of dwellings built is met. Further,

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

a concern is that the development on the proposed sites may exceed substantially what is being asked to agree to in the plan. Preference should be given to building on existing developed land, such as SR-0555 (St Margaret's Hospital), SR-0348 and SR-0349. If building on car parks however, consideration must be taken as to where people using the high street etc. are going to park their vehicles and without this consideration I would not agree to such a development. Whilst not an ideal proposal, subject to suitability I would support building on SR-0229 (Epping Station Car Park) provided parking facilities were retained for station parking and for high street use. The council should retain an interest in the car parking to ensure that the facility remains as an affordable public amenity, as without parking the high street would be detrimentally affected. Private companies should not be employed to manage the car parking and it should not be turned over to any developer, as it is unlikely that they would value parking as a public amenity and would make it unattractive to people wanting to use the high street, in terms of cost and maybe flexibility. This would have a detrimental effect on the success of the high street, a vital character aspect of Epping Town. Building at SR-0347 (Epping Sports Centre Nicholl Road), whilst also not ideal, is also a better option than green belt land as it is an existing development, which i am told the sports centre is coming towards the end of it's life span and quite costly to maintain as a result of its age. Whilst I appreciate it is necessary for sports amenities to be provided locally I am told that a possible relocation is not far in North Weald which is served by buses. I do not agree with any development in Epping that builds on the green belt land under any circumstance. If EFDC insists that they have no option, whilst I would still NOT agree, it would make sense for land considered to be built on to be taken from areas which are worked on (like agricultural land which is actively used for farming) for example SR-0069/33 (which has the motorway at its boundary) and SR-0113B, which appear to be active farming fields, and not those that have become habitats for a mix of wildlife and nature. However, consideration must be taken of the local infrastructure and the affect on the expanding boundary of the town into the green belt which is being expanded to here significantly. Still, however, development on the green belt should be avoided at all costs. I disagree strongly with the proposal for development of SR-0208 as, in contrast to the above discussed proposals, the land is green belt land which is well established as meadows containing mature trees and supporting a wide mix of wildlife and nature. Further, the land is connected to Bell Common conservation area and development here further would lead to a deterioration of this. Strong disagreement also applies to SR-0071 for the same reasons that the land is well established meadows and mature trees which provide both a public amenity and a habitat for a variety of wildlife and nature. I cannot

comment on all the proposals here, but please note an absence of a comment should not be taken as a view of agreement with such.

Loughton (Draft Policy P 2)

**No opinion**

Please provide reasons for your view on Loughton:

Waltham Abbey (Draft Policy P 3)

**No opinion**

Please provide reasons for your view on Waltham Abbey:

Chipping Ongar (Draft Policy P 4)

**No opinion**

Please provide reasons for your view on Chipping Ongar:

Buckhurst Hill (Draft Policy P 5)

**No opinion**

Please provide reasons for your view on Buckhurst Hill:

North Weald Bassett (Draft Policy P 6)

**No opinion**

Please provide reasons for your view on North Weald Bassett:

Chigwell (Draft Policy P 7)

**No opinion**

Please provide reasons for your view on North Weald Bassett:

Theydon Bois (Draft Policy P 8)

**No opinion**

Please provide reasons for your view on Theydon Bois:

Roydon (Draft Policy P 9)

**No opinion**

Please provide reasons for your view on Roydon:

Nazeing (Draft Policy P 10)

**No opinion**

Please provide reasons for your view on Nazeing:

Thornwood (Draft Policy P 11)

**No opinion**

Please provide reasons for your view on Thornwood:

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

**No opinion**

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

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

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

Strongly disagree

Please explain your choice in Question 7:

The draft local plan has not included an infrastructure delivery plan. There are promises made in the document as to infrastructure but no details provided as to where, and the amount and at whose cost these would be provided. In particular no details have been provided on the location of these and suggested expansion into the green belt is not agreed with. Community Infrastructure Levies do not have to be spent in the area in which they arose and so additional development that would likely have a significant impact on Epping may not be spent in Epping on the required infrastructure to support this development. Before any development is agreed assurances should be obtained as to the required infrastructure being delivered and in what manner.

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

Additional communities in and around Epping are likely to increase demand on the central line and for parking, as well as increased traffic congestion. I am not reassured by the lack of evidence and conflicting statements within the plan. Having used the central line daily, I am surprised that ARUP are informed that the central line is only 37% utilised in the mornings. On many occasions, finding a seat in the morning peak is difficult. Additionally, traffic congestion is not limited to rush hour on a Monday to Friday. Often there are long delays throughout the day and at weekends. Additional housing in and around Epping is only going to increase the congestion and further development will be required in terms of infrastructure and will likely lead to further destruction of the green belt. The report talks about bio diversity importance but this is obviously not a priority with EFDC in that a substantial number of proposals for development are on green belt land with little consideration for the required infrastructure to support this, which will likely require further destruction of the green belt. The report also talks about supporting local jobs, however, proposals for development are also made for building on existing employment sites, which seems to go against this statement.

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

Policy DM14

Shopfronts policies needs more ambition and strengthening.

Policy DM7

Heritage assets needs urgent reviewing to increase the local listings and should specifically be identified in this policy as heritage assets.

Policy DM 9

the public should be able to give their views on Masterplans. EFDC should form an advisory design panel.

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