



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

Stakeholder ID	2998	Name	David	Spiby
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: <a href="mailto:ldfconsult@eppingforestdc.gov.uk">ldfconsult@eppingforestdc.gov.uk</a>

# 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:

No. The vision seeks to protect the Green Belt, but the draft local plan fails to do this and will result in the loss of many clear and definable Green Belt boundaries.

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:

No. The incursions into the Green Belt have been ill-thought out, and there is no detailed justification for 360 new houses in and around Theydon Bois. None of the evidence produced by EFDC supports their new approach to sustainable development with regard to Green Belt Boundaries and it is not in line with government thinking. It is not logical to distribute housing allocation and other development around all of the settlements in the District. New development should be focussed on the towns in the District where they will benefit from strong existing infrastructure and facilities. These are better suited to provide additional associated development such as increased school capacity or larger doctors surgeries'.

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

Disagree

Please explain your choice in Question 3:

While we believe it is more sustainable to focus development on towns, any approach that encroaches into the Green Belt is not welcome

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

Epping?

No opinion

**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:

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

Strongly disagree

Please explain your choice in Question 5:

No. EFDC's plans for employment development on Green Belt sites are not sustainable and will have adverse impacts on transport links, infrastructure and local job opportunities. New employment opportunities should be directed towards the larger allocated sites close to, and within the towns of the District or settlements which are keen to expand in a sustainable manner. NB. In planning terms "Sustainable Development" is development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

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

Epping (Draft Policy P 1):

# No opinion

Please provide reasons for your view on Epping:

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

Please provide reasons for your view on Theydon Bois:

No. Four of the Theydon Bois sites are in the Green Belt and these parts of the Green Belt have been identified as suffering a high or very high levels of harm should they be allocated for housing. This harm will result in encroachment into the countryside and undermine the rural character and setting of our village. 360 new houses in and around Theydon Bois is a disproportionate allocation and amounts to a 23% increase in the

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size of our village which would destroy our present character and therefore not comply with EFDC's 'Vision'. Present and foreseeable infrastructure cannot support this amount of growth.

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:

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

### Strongly disagree

Please explain your choice in Question 7:

No. The plan does not state what the specific requirements for infrastructure will be. At best this subject is generalised and difficult to quantify as part of a new development. There are no provisions to ensure that the infrastructure needed will be provided in the right place at the right time. 8. An Interim Sustainability Appraisal has also been commissioned to support the Draft Local Plan. We would welcome any comments you may have on this. (See Technical Document page). The Interim Sustainability Appraisal does not support the wide dispersal of development in and around the large and small villages of the District. In respect of Theydon Bois the transport links are already at capacity and the underground is well over capacity at peak times. The underground station is poorly served by the existing road network and bus services, such that new development designed and located to use the station will further add to the congestion and over-crowding already experienced around the station and on the trains. The large increase in Theydon's population will still have to rely on the larger settlements for a wide range of facilities. Due to overcrowding and poor transport links this will result in a substantial increase in car journeys that will add to congestion and cause further damage to the local roads. The Sustainability Appraisal recognises that the use of Green Belt sites would give rise to sustainability concerns. This is particularly relevant for the villages around the District. The Sustainability Appraisal states the approach to the Green Belt sites will protect the most high value sites from development. The document then contradicts itself by stating high quality Green Belt land will be lost. Case Law has concluded that housing numbers alone are not classed as a very special circumstance for development in the Green Belt. All clear and defensible green belt boundaries should be maintained. 9. Do you wish to comment on any other policies in the Draft Local Plan? The policies are severely lacking for example, there are no detailed Green Belt policies to define disproportionate extensions to properties in the Green Belt, or direct what is meant by 'materially larger'. How do we approach redevelopment of previously developed land in the Green Belt? What is required is a consistent approach at District level and more detail regarding such policies as those on design and the infrastructure. This should ensure that local character of villages such as

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Theydon is maintained or improved. How will you stop planning applications for the new housing from coming forward before a 'masterplan' has been produced for the site? Parking provision is not mentioned in the detailed policies of the local plan.

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

The Interim Sustainability Appraisal does not support the wide dispersal of development in and around the large and small villages of the District. In respect of Theydon Bois the transport links are already at capacity and the underground is well over capacity at peak times. The underground station is poorly served by the existing road network and bus services, such that new development designed and located to use the station will further add to the congestion and over-crowding already experienced around the station and on the trains. The large increase in Theydon's population will still have to rely on the larger settlements for a wide range of facilities. Due to overcrowding and poor transport links this will result in a substantial increase in car journeys that will add to congestion and cause further damage to the local roads. The Sustainability Appraisal recognises that the use of Green Belt sites would give rise to sustainability concerns. This is particularly relevant for the villages around the District. The Sustainability Appraisal states the approach to the Green Belt sites will protect the most high value sites from development. The document then contradicts itself by stating high quality Green Belt land will be lost. Case Law has concluded that housing numbers alone are not classed as a very special circumstance for development in the Green Belt. All clear and defensible green belt boundaries should be maintained.

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

The policies are severely lacking for example, there are no detailed Green Belt policies to define disproportionate extensions to properties in the Green Belt, or direct what is meant by 'materially larger'. How do we approach redevelopment of previously developed land in the Green Belt? What is required is a consistent approach at District level and more detail regarding such policies as those on design and the infrastructure. This should ensure that local character of villages such as Theydon is maintained or improved. How will you stop planning applications for the new housing from coming forward before a 'masterplan' has been produced for the site? Parking provision is not mentioned in the detailed policies of the local plan.

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