

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

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Letter or Email Response:

Introduction While I understand that EFDC is operating under constraints imposed by central government and anyway that some issues arise in a national and international context which EFDC cannot alter other than very indirectly, I think that it is important to record some points of dissent about the assumptions under which it is operating. I will come back to consider the contents of the plan after making these preliminary points. My major reservation concerns the presumption that further economic development and growth in population and housing consequent on that is desirable in this part of the country. The pressures for further development mean that the amount of open countryside and access to the natural world is reduced so that it is more difficult to obtain the benefits which arise from what are sometimes called 'natural services' such as access to peace and quiet, to natural beauty, to exercise away from traffic and to the ability to observe non-human animals. Furthermore, traffic congestion whether by road, rail or air puts stress on individuals and increases greenhouse gas emissions. These pressures could be relieved if the central government were to encourage development into those parts of the country where pressures are less great and where it would help to rebuild communities which have suffered from the loss of traditional industries and services and where housing needs renewal. This would therefore not be a policy of 'nimbysm' as it would encourage development into areas where there was a clear desire for it and discourage it in areas like our own which are suffering from too much development. Another national government policy which could help relieve pressure on road usage and hence both make people's lives better and help the environment and reduce global warming would be to return to raising fuel duty at above inflation rates (although in the longer term road pricing, which is almost certainly now technically feasible, would be a better policy). The government has once again missed this opportunity in its Autumn statement, which is also foolish as government is seeking to increase its revenues and reduce the net public account deficit. This might not be popular with some, but its effects could be fairly easily avoided since most people can reduce their use of cars, can buy smaller vehicles or postpone purchases of new ones. Of course, some would doubtless find it more difficult to avoid the impact on their finances but this is inevitably the consequence of any rise in costs - prices are simply a signal to purchasers of goods and services of the relative resources required for their production, which in this case include the total costs, including externalities such as impacts on the environment. While I have no particular personal concerns about migration, it appears that many people do. The underlying reason for it is that employment opportunities are created where there is little or no readily available labour supply, so that migration is virtually the only way of meeting the demand. For this reason and because of the pressure on environmental resources, the idea that 'job creation' is necessarily a 'good thing' is absurd. This is not to deny that there may be pockets of deprivation within an otherwise prosperous area, which one gathers is the case in parts of East Anglia, and perhaps even in Harlow according to this plan, although as I do not know Harlow well I will not comment on that. The use of the word 'need'

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throughout the document and especially in connection with the employment and housing 'needs' is very dubious. I will not go into the more philosophical issues but it seems to me that you (and I realise that you are following central government guidance) have used the word to give the impression that meeting these 'needs' is in some way necessary or beneficial (prima facie meeting a 'need' is always desirable). In fact, to avoid a long discussion of the issue, what is meant is that certain presumptions or goals are imposed on us/you and the so-called 'needs' are simply their implications translated into various fields of activity. However, as stated at the outset, I recognise that EFDC is obliged to work within the assumptions set by the UK government, so although I think that to add to jobs, houses and employment to the extent envisaged in this area is not sensible or desirable I accept that until we can bring about a change in policy at national government level you have to work within this framework. I was pleased to see that a raft of policies is to be followed aiming to enhance the quality of life of the residents of the district within that constraint. I shall only pick out a few points for comment from within Sections 3 and 4. Chapter 3 Strategic policies Draft policy SP1 Sustainable development I was encouraged by the description of this in 3.28 particularly the final sentence "Sustainable development is defined as development which meet the needs of the present without compromising the ability of future generations to meet their own needs." The concept of sustainable development is primarily concerned with environmental protection and this seems to be recognised here. However, unfortunately the word is 'sprayed around' in this document as if saying the words could make any building or piece of infrastructure environmentally acceptable without needing to consider the detailed content. Furthermore, since it is unlikely that anyone would say that they were proposing unsustainable developments the use of the word is often redundant - the document does not need constant repetition of the words although it is important that in such matters as housing, transport infrastructure, and commercial premises it spells out that the development be sustainable. Having said this, I must say that the second paragraph of the Draft Policy statement (in green after para 3.32) seemed to me to be incoherent. I read it several times but could not understand what it is trying to say. At para 3.59 on p39, I particularly disliked the reference to an "aspirational level of employment". This links with 3.61 ix on p41 which says that the Council will "seek to increase workforce participation and encouraging older workers to continue to work". I gather that 'workforce participation' does not mean that workers will be encouraged to participate in management of enterprises as one might have thought but that people should be encouraged to join the paid labour force and that those who have reached retirement age should carry on working. It seems to me that this should be up to the individual to decide and not subject to pressure from either central or local government. SP5 Green Belt and District Open Land I do not have any quotes to hand but I am sure that I have heard government ministers, MPs and local politicians say in quite recent years that the Green Belt is safe in their hands and that they will protect it but this section of the plan makes it plain that this is not true. While para 3.82 states the purposes of the Green Belt quite well and clearly the next para then states that its boundaries should be reviewed and given the 'assumptions' already discussed and described again in the subsequent paragraphs here it is obvious that such a review could only result in a reduction in size of it (see particularly para 3.85 and 3.92). It is true that at para 3.90 the plan states that the Council "seeks to minimise the use of Green Belt land for development whilst focusing development in the most sustainable locations" (a good example of the use of the word sustainable without any clear idea of what it means); but this seems somewhat meagre comfort. Although I have said that I will not comment in detail on the proposals for land near Harlow I suggest that the argument in para 3.90 is inconsistent. I understand the word 'regenerate' to mean to breathe new life into something, or perhaps to bring back to life, but this is quite different from saying that it needs to grow larger. Of course, I know that this is just a matter of words, but it is the intention behind them that concerns me. Although the draft Plan envisages losing only 1.5% of the Green Belt in EFD when you look at the proposals for individual settlements one sees that most of them involve some loss of Green Belt land, and these losses being on the fringes of the settlements are possibly more harmful than if they were located elsewhere. I think that there is something in the criticism that the Green Belt is to an extent a mechanism for maintaining gaps between settlements and that it is for the great part farmland, used for food production, often by intensive methods, and, in the case of Essex where most land is arable, involves the intensive application of toxins; furthermore, there is no public access except where public rights of way exist while some of the land is not particularly beautiful. Therefore, much of it does not add to the true 'green' infrastructure, and provides limited opportunities for recreation. While policy with regard to agricultural practices is the domain of central government and the EU for the time being, and the county council is the Highways Authority with responsibility for rights of way, I think that this plan could have said something about making farmed Green Belt land more attractive, more accessible and a greater contributor to genuine sustainability. For example, I know that under the Countryside and Rights of Way Act 2000 (the CROW Act) Highways

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Authorities are required to produce rights of way improvement plans, although unfortunately they are not required to implement them, but this could be a useful field for further exploration. Chapter 4 District wide policies Draft policy E2 Centre Hierarchy/Retail Policy While the principles outlined at H on p67 seem sound I cannot help thinking that they do not seem to have been applied recently to the developments at Langston Road in Loughton. I think the last thing we need or want is more out of scale development bringing further traffic to this already over-developed area. At the same time they threaten the continuing viability of the Broadway. Draft Policy E3 Food Production and Glasshouses Some of my earlier remarks are relevant to the general issue of food production. Personally I think that glasshouses are inappropriate for the Green Belt as they ugly whether seen from a distance or close to, their close surrounds are usually unkempt and full of dumped rubbish and public rights of way passing nearby are often difficult to use because of the rubbish and fact that, as the area is usually unattractive, few walk there. You will gather from what I have said elsewhere that the reduction in employment from a decline in this industry would, in my view, be a good rather than a bad thing. However, from the perspective of the UK as a whole and from the global viewpoint I can see that their products are for the most part more healthy, despite a rather intensive use of chemicals, and therefore beneficial to human health than many other kinds of food. If this economic activity is going to take place somewhere it would be nimbysism to argue for trying to get rid of it in our district and to see it transferred elsewhere, either in the UK or elsewhere. Therefore, somewhat surprisingly I find your proposals broadly acceptable. Draft Policy E4 The Visitor Economy I only have a couple of points to make here. First, I am surprised that no mention is made of the network of public footpaths and bridleways throughout the district which are a great asset, and are generally underused; this network also has the merit of enabling visitors to reach all parts of the district rather than concentrating them in limited 'honey-pots'. While it is unlikely that EFD would come to rival the Chilterns or the Surrey Hills as a destination, its attractions are under-appreciated, and this kind of visitor generally poses fewer problems than many kinds of 'harder' commercial development. Secondly and in the same line of thought, the challenges for the environment and local communities from increasing tourism numbers mentioned at para 4.71 seem exaggerated. Only in very limited places like High Beach on a summer Sunday is this a real problem. Draft policy T1 Sustainable Transport Choices I only have a couple of points to make. First, I was glad to see that at F iii on p76 occurs a reference to public rights of way, although I was surprised that they are not mentioned at A ii (p75) which only mentions "walking networks", although I presume that is because most public rights of way are in the countryside rather than in areas of new development. Secondly, I cannot see any mention in this section of the fact that the Central Line is probably the most overcrowded line on the TfL network and therefore any development likely to increase passenger numbers should be avoided if at all possible. There may be some relief at the London end when Cross-Rail arrives but this should not be regarded as a reason to allow further development in anticipation of it. At 4.89 the suggestion that more land should be allocated to car parking because of the size of modern vehicles should be rejected. By maintaining current allocations pressure can be put on people, and ultimately on manufacturers, to downsize their vehicles, or at a minimum not increase them, which apart from anything else would be beneficial for the environment. Draft Policy DM4 Suitable Accessible Natural Green Spaces and Corridors I have remarked elsewhere that there is already a network of public rights of way and there are limited areas of open public access to land in addition to Epping Forest and the Lea Valley Regional Park, but any proposals to extend such access by designating additional areas and public rights of way would certainly be welcome, particularly in those parts of the district where there are fewer already existing rights and in connecting settlements with the countryside. Much the same can be said in relation to the next section on Draft Policy DM5 Green Infrastructure: Design of Development. Chapter 5 Places I shall confine my main comments to proposals for Loughton where I live and which I know best but I will make a few points about other settlements, but there are a couple of general points. The maps, particularly the site allocation maps, are very hard to read or understand as they do not show names of roads or other features. It would also have been helpful if they had shown public rights of way. One of the major problems in moving about the district is congestion on roads and on the Central Line. It is not obvious that this has been taken into account in the proposals for house building and employment, which is a serious omission. Loughton/Loughton Broadway Para 5.29 Key strengths and weakness 2nd bullet point. Although it has good accessibility by the Central Line, the trains are over-crowded so any development either in Loughton or elsewhere which adds to that should be avoided. 3rd bullet point. Use of local roads has increased markedly in recent years which harms the pleasantness of the area and health, so further development in the area should be avoided. 5th bullet point. In my view the Langston Road retail development is greatly to be regretted (I know that it is already under way). Why does the Council wish to encourage even more traffic and has it approved the skyscrapers? The only argument I know for this is that it means that some

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people who used to travel outside the area may do more shopping in the district, but why is that a good thing? It may be a bit nimbyish to let other areas take this trade but if the facilities already exist elsewhere, then the burden of this activity is already in place. Furthermore, it will threaten the viability of The Broadway which it is supposed to be your aim to support. This comment is also relevant to para 5.50. Preferred approach para 5.31. Why would anyone want to turn Loughton into a 'major town'? It is a pleasant suburb just about kept separate from its neighbours, which like anywhere could be improved but not by attracting more houses, traffic and pollution. Draft Policy P2- residential sites I do not myself live near the various 'greens' in Debden (I include the Borders Lane playing fields in that description) but they are a pleasant feature of the area which help to make the estate an example of good post-war planning in what was obviously a more optimistic and enlightened era, they add to the amenities of the area for those living nearby and provide opportunities for informal recreation (dog walking, meeting neighbours, engaging with nature, enjoying a sunset) which increase health and well-being. Therefore, I strongly oppose A iv, v, and vi. The most acceptable of these proposals are i and ii as these car parks are hardly things of beauty, but it would be necessary to at least maintain the parking provision, and the new buildings should not be more than about three storeys in height as some of those recently developed in the Langston Road and Debden areas have been. Elsewhere the document rightly speaks of wanting high quality developments, so building on these sites will be a challenge but better than the alternatives, although given their proximity to the stations, they will add to pressure on Central Line capacity. Why not add Sainsbury's car park which is adjacent to the station car park at Loughton to the list? I am much more sceptical about building on the car park adjacent to Loughton Library (incidentally the way this is worded suggests that you might have it in mind to close the library and build houses on that as well, which I would strongly oppose). The library is quite an attractive building and the car park is much better landscaped than the station car parks and Sainsbury's car park are. Epping The only point I will make about this is that it would be very regrettable if building were to take place in the area immediately east of the station (SR0153, I think). One of the pleasures of commencing a country walk in Epping is that on this side you are immediately in open country when you cross the railway line - the Essex Way, probably the premier long-distance footpath in Essex, goes over these fields. By contrast to walk north or west from the station involves 20 minutes or so walking through the town (uphill too!) before countryside is reached. Development here would also clearly add to pressure on the Central Line. Theydon Bois The proposal to build at the two sites on the east side of the railway would have the unfortunate effect of bringing development into a currently pristine rural area, which would be removed from the Green Belt and, I strongly suspect, would make this area vulnerable to further development proposals in future. In addition, the proximity to the station would mean most residents at this site would use the Central Line. Additional comment There is a suggestion that the Council should consider a completely new settlement in a greenfield site rather than the proposed piecemeal developments. I have said in my introduction that I think that the best solution to the future development needs of the country (assuming, of course, that our contribution to global warming and other environmental issues were minimised) would be to encourage it to take place in those parts of the country where there is a clear need and desire for renewal. Therefore, I do not think that this proposal would be a good solution if it is envisaged that the new settlement should be in the countryside within our district as this would just amount to nimbyism, (dumping the development in some rural area) even if matters like the impact on transport links could be resolved satisfactorily.

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