

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

Stakeholder ID	1339	Name	John Manning
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Method	Letter
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Date	16/11/2016
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Letter or Email Response:

Dear Sirs, I am attaching my comments on the Draft Local Plan dated 26 September 2016. This is in response to your request for written comments as requested on page 20 of the document. I would be grateful if you could acknowledge that my comments have been received. I would also like your reassurance that they will be addressed by the relevant committees and that these views will be incorporated in the Plan before it is finalised. The comments have been prepared in my professional capacity as a chartered Engineer and fellow of the Institution of Civil Engineers.
Redacted....

1. Although the housing allocation is based on local areas, the centre for amenities and services for a number of these is centred on Epping. The local plan envisages 1633 homes in Epping (a town), 1578 homes in North Weald (a large village), 279 homes in Coopersale (a small village), 124 homes in Thornwood (a small village) and 354 homes in Theydon Bois (a large village). A total of nearly 4000 homes in an area which could be described as the environs of Epping. With a prediction of four people per dwelling it is possible that approximately 12000 people could centre on Epping Town for essential day to day activities and services; this is approximately a doubling of size for Epping. The plan includes provision for consideration of the impact which development of individual sites may have, but it does not address the zonal effects on town centres other than in a very general way. Should not this 'town centre impact' with respect to services and amenities be subjected to more consideration in a local plan which acknowledges that "Epping will continue to thrive as one of the main centres in the district"? 2. The Draft Policy Document for all of the proposed residential sites contains a proviso :- Infrastructure requirements must be delivered at a rate and scale to meet the needs that arise from the proposed development, in accordance with the infrastructure delivery plan. The Infrastructure Delivery Plan is therefore an integral part of the local plan and should be published at the same time. The statement in Chapter 6 "the Council is in the process of developing an infrastructure Delivery Plan (IDP) is vague. No programme for this is given. It is my view that the requirements for infrastructure have not been adequately addressed and the adoption of the Local Plan should be delayed until more details on the IDP are known. It is on this issue that there is most local concern. The Government National Infrastructure Commission investigations are at a consultative stage (Appendix 2). The Commission is querying how can infrastructure best support growth, how should we decide what we repair and what we build, and who should pay for it". The focus is centring on Transport, Digital Communications, Energy, Water and Waste (drainage and sewerage), Flood Risk, Solid Waste. The same questions should be asked for EFDC before the Local Plan is adopted. The draft policy headings address these issues in a generalised way with well set out objectives but contain no detail as to how the provision of suitable infrastructure will be delivered. There is considerable emphasis on "the developer is to fund appropriate improvements" but little on how

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this is to be effected or allocated. 3. Consideration of Environmental and planning aspects for the proposed sites for residential development are well set out in the 21 Draft Policy heading as objectives and constraints. If it is argued that the implementation of these objectives and constraints is to be through the planning process, the Council should reassure the public that there will be a requirement for a full environmental impact Assessment (EIA) before any development proceeds and that this procedure will be transparent and open to challenge by the public. An essential part of an EIA is a quantification of the base case and the council should have included a programme and strategy for measurement of existing environmental criteria as part of the Draft Plan. The prediction of change due to potential developments, as identified in the Draft Policy criteria, will be a complex and costly task. The Council should reassure the public that this cost will fall on developers and that appropriate consultants will be used by the Council for the assessment of the wide range of disciplines involved. 4. Increased traffic and air pollution in Epping High Street are just two of the aspects which would result from an increase in population in the area as identified in paragraph 1. There is already local concern about these issues which are approaching an unacceptable level. This is acknowledged in the Draft Plan, Draft Policy T1. The construction of north facing slip roads on the M11 at Debden would most probably reduce traffic using Epping High Road and would enable local traffic south of Epping to have access to the motorway system without travelling to and from the junction at Harlow. There would be a consequential reduction of traffic through the forest which is raised as a concern in the Report. The report has ignored the consideration of this facility in spite of it being raised as an issue in the consultative stage and with the local MP. Whilst the construction of M11 Junction 7A at Harlow will reduce congestion at M11 Hastingwood and give better access to A414, it is unlikely to reduce through traffic at Epping. The report acknowledged the problems which arise when there are incidents on the M11 and M25 which are particularly evident in Epping High Road. A full M11 junction at Debden would provide greater flexibility for traffic to find its way around Epping. The Plan for Loughton (page 221) identifies land at Oakwood Hill, Langston Road Industrial estate, (SR-0355A) and other EMP land on and adjacent to which north facing slip roads could possibly be constructed. There is an urgent need for a full civil engineering based study which was foreseen at the M25 Public enquiry in 1976. See Appendix 1. 5. Appendices. Appendix 1_submiss by ...Redacted... to open meeting with Eleanor Laing MP held on Friday 22 January 2016 at Epping Hall. Also sent to EFDC in response to request for comments of first draft plan. January 2016. Appendix 2. NIA consultation response. Process and methodology. National Infrastructure Commission October 2016. As a local resident, I wish to make three points in relation to the EFDC Local development plan, housing and the Green Belt traffic. 1. Traffic in Epping High Street There has been a significant and steady increase in traffic passing through the town and this has resulted in congestion and high levels of M25 Pollution. Those who remember the M25 Inquiry in 1976 and the long hearings in the cock inn lasting about one year will recall that the government proposals included the provision of west facing slip roads on the M25 at Bell Common. The inspector recommended the removal of these which enabled the road to be lowered and the extension of the green deck as it is today. The inspector raised the question of access to the motorway system for local traffic. He instructed a rerunning of the traffic analysis and the result found that 30,000 vehicles per day were transferred from the A11 through the Forest to the M11. The analysis assumed access to the motorway system and as a consequence the inspector stated that the north facing slip roads at Debden should be built "within the foreseeable future". There is now a consideration of this provision which could possibly reduce the volume of traffic passing through Epping and the Forest. 2. Use of Environmental impact Assessment when considering development in Epping and around the Forest. A document produced for the Essex Development Control Forum and The Essex Planning Officers' Association, "The Essex Guide to Environmental Impact Assessment" Covers the full range of topics which are relevant to any development in the vicinity of Epping Forest. These are summarised below. 1. Effects on population from socio-economic change. 2. Effects on population from noise and vibration. 3. Effects on population from traffic. 4. Effects on population from major hazardous incidents. 5. Effects on Fauna and Flora. 6. Effects on land-geology and soil. 7. Effects on land- major land uses - agriculture and farming. 8. Effects on Water. 9. Effects on air and climate. 10. Effects on Landscape and visual impacts. 11. Effects on material assets and architectural and archaeological heritage. The local development plans have focussed largely on housing and zoning and are indicative of relying on planning applications to control how the stipulated government quotas should be met. Due to the sensitivity of Epping Forest to any development it is essential that the wider issues are considered for all development in the EFDC area. There is a need for transparency in the planning process consideration of a full EIA for each proposal to be made public. This should include data on the base case, mitigating proposals and assessed outcome. 3. Coordinated Infrastructure proposals for the wider area The EFDC area is influenced by the provision of infrastructure over a wide area. The proximity of M25, Stansted Airport, access to Central London, Harlow development, the Green Belt, the Forest and variety of land use renders the coordination of

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infrastructure particularly complex and calls for integration of local and national bodies. An overall body dealing with infrastructure and long term planning, even for events such as 1 in 100 years is not in evidence. The Theme of better infrastructure planning is the focus of a recently established national infrastructure commission headed by Lord Adonis and strongly backed by the Institution of Civil Engineers and its current president Sir John Armitt. The findings of this commission will need to be assessed in relation to planning in the Green Belt and the Epping Forest region.

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