

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

Stakeholder ID	1678	Name	GEOFF KING
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Method	Letter
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Date	3/3/2017
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Letter or Email Response:

Q1 Top priorities

1. Green Belt: We strongly agree that the Green Belt should be protected as a top priority, and that it is not acceptable to nibble away at it, or use weasel words such as "releasing" it.
2. Numbers: We believe that the other top priority should be to get the numbers allocated to Epping significantly reduced. Achieving a significant reduction in the numbers will help to mitigate/resolve some of the other issues raised by the Local Plan. The Local Plan document
3. General: The latest draft Local Plan is a poor document, given the years it has taken to get to this stage, and the amount it has cost in consultants' fees. It is not clear what impact or influence our elected representatives have had on it, beyond a limited role in site selection. It suffers major omissions and lacks clarity - e.g. on housing types and densities. This is a local plan which takes very little account of the local situation or the wishes or needs of local people. The sole driver of it appears to be the allocation of a soviet-style quota of new-build housing. It has obviously been over-influenced by consultants and developers. It is also totally lacking in imagination and innovative thinking.
4. Transparency of ownership: All sites proposed for development in the local plan should have their owners identified - this means the beneficial owners, not trusts, holding companies, offshore entities etc.. If the owners are not prepared to be identified their land should not be put forward for development. It is important that local residents can have full visibility of what is going on, and can gauge for themselves the extent of any possible conflicts of interest.
5. Conflicts of interest: Given the overwhelming importance of the Local Plan to the future of Epping and the surrounding area - not least the Forest - it is very important that conflicts of interest affecting the decision-makers are clearly identified, including the nature of the conflict. Furthermore, in our view, it is not sufficient for a Councillor to indicate a conflict of interest and then contribute to the discussion anyway: those who have a conflict should recuse themselves from the discussion and any voting. Whilst we do not know that any Councillors have a conflict of interest on this matter, the lack of adequate transparency - over who has an interest in a given piece of land - means that we do not know that they do not.
6. Loss of recreational facilities: We are concerned that the proposed use of sports centres and sports grounds for housing follows the pattern of the closure and non-replacement of adult education centres in the area. With a High Street where estate agents offices are replacing shops there will be fewer reasons to spend leisure time in the town. The people of Epping are being called upon to make sacrifices so that developers may prosper. The current Local Plan is unacceptably woolly about the provision of replacement facilities when existing facilities are taken over for housing. The Plan would only be acceptable if there were binding commitments to replace with better, in Epping, before the existing facilities are closed.

Q2 Housing specifics

1. Numbers: The housing numbers put forward for Epping in the draft are unrealistically high (particularly when the types of housing to be built are completely undefined). We believe that a very strong line needs to be taken on this, so as to get the number markedly reduced. EFDC is not working remotely hard enough on this key issue.
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Types of dwelling: This is an enormous failing in the current draft local plan - it gives no meaningful information on, or justification of, the numbers per site, the types of dwelling, or the reasoning behind the proposed densities (some of which seem perverse). There is a world of difference between a multi-storey block surrounded by parkland and a former field full of bungalows ripe for future extension. These matters must not be left to the developers - in fact we propose that the Council itself should take control, and be thoroughly prescriptive over all aspects relative to what is actually built. 3. Who for?: There is no discussion in the Plan concerning who the new dwellings are for. We have been struck by the statistics showing how many people not currently living in the area want to move in. At the same time we are also conscious of the difficulty young people have in finding affordable housing, and of the importance of Epping not becoming more of a dormitory/ commuter town. We accept that some additional housing needs to be developed in Epping, but it is fundamental that this should be to the benefit of local people. We therefore think that at least 50% of it should be reserved for local people, and genuinely affordable for local first-time buyers. This type of approach has been developed in other parts of the country and there is no reason why it can not be applied here. Site selection 4. Sites identified in the current draft: In general we support the reasoning behind the approach of locating development to the South and East of Epping, subject to two overriding priorities: 1) Green Belt: the Green Belt should be protected as a top priority; it is not acceptable to nibble away at it, or use weasel words such as "releasing" it. The proposed "policy" is therefore not remotely acceptable. 2) Numbers: the numbers allocated to Epping must be significantly reduced. Achieving a significant reduction in the numbers will help to mitigate/resolve some of the other issues raised by the Local Plan. A further proviso is that the availability of a piece of land and a willing seller is by no means sufficient to warrant inclusion in the Local Plan. 5. Alternative development sites: (i.e. other than those proposed in the current Local Plan). There must be public consultation on any alternative which may be given serious consideration by EFDC, before possible inclusion on any future version of the Local Plan. There appears to be no provision for this in the current Plan timeline. 6. Sites which have previously been considered but have now been ruled out: We have been extremely concerned that publication of the Local Plan appears to be seen by some (including some Councillors) as an opportunity to put back into play sites which have been very clearly ruled out, with a complete lack of clarity as to rationale or justification. This is very disturbing. If any alternative sites are to be seriously considered it is essential that they are properly researched and consulted. Ad-hoc solutions which have not been robustly researched or objectively and openly arrived at would not be acceptable. There must be a commitment not to re-consider sites which have previously been under active consideration (i.e. some of the sites designated "EPP - ..." during earlier consultation rounds) but then have been ruled out in the current Local Plan. Developers and landowners and mere availability must not be allowed to dictate site locations. Q3 Any development to the South of Harlow will inevitably impact adversely on Epping and its already over-stretched transport and parking. The level of commuting from Harlow to the Central Line station will undoubtedly increase, (until some common sense is injected into the relative rail fares in to London). Q4 The Plan offers nothing substantive by way of improving the nature and appearance of Epping High Street. It contains no appreciation of current and projected shopping trends - i.e. internet shopping. Increased traffic through Epping, and aggravated parking problems will hardly stimulate increased footfall in the High Street. Q5 What new employment - apart from builders and estate agents? Q6 Top priorities 1. Green Belt: We strongly agree that the Green Belt should be protected as a top priority, and that it is not acceptable to nibble away at it, or use weasel words such as "releasing" it. The proposed Plan is therefore not remotely acceptable. As written it is in any case meaningless. EFDC must fight much harder to protect the existing Green Belt, rather than meekly accepting imposed quotas for new housing, and using this as an excuse to eat into the Green Belt. EFDC should be making a robust case for reducing significantly the housing numbers so as to safeguard the Green Belt we have now. 2. Numbers: We believe that the other top priority should be to get the numbers allocated to Epping significantly reduced. Achieving a significant reduction in the numbers will help to mitigate/resolve some of the other issues raised by the Local Plan. Housing specifics 3. Numbers: The housing numbers put forward for Epping in the draft are unrealistically high (particularly when the types of housing to be built are completely undefined). We believe that a very strong line needs to be taken on this, so as to get the number markedly reduced. 4. Types of dwelling: This is an enormous failing in the current draft local plan - it gives no meaningful information on, or justification of, the numbers per site, the types of dwelling, or the reasoning behind the proposed densities (some of which seem perverse). There is a world of difference between a multi-storey block surrounded by parkland and a former field full of bungalows ripe for future extension. These matters must not be left to the developers - in fact we propose that the Council itself should take control, and be thoroughly prescriptive over all aspects relative to what is actually built. 5. Who for?: There is no discussion in the Plan concerning who the new dwellings are for. We have been struck by the statistics showing how many people not

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currently living in the area want to move in. At the same time we are also conscious of the difficulty young people have in finding affordable housing, and of the importance of Epping not becoming more of a dormitory/ commuter town. We accept that some additional housing needs to be developed in Epping, but it is fundamental that this should be to the benefit of local people. We therefore think that at least 50% of it should be reserved for local people, and genuinely affordable for local first-time buyers. This type of approach has been developed in other parts of the country and there is no reason why it can not be applied here.

Site selection

6. Sites identified in the current draft: In general we support the reasoning behind the approach of locating development to the South and East of Epping, subject to the overriding priorities identified at 1. and 2. above. A further proviso is that the availability of a piece of land and a willing seller is by no means sufficient to warrant inclusion in the Local Plan.

7. Alternative development sites: (i.e. other than those proposed in the current Local Plan). There must be public consultation on any alternative which may be given serious consideration by EFDC, before possible inclusion on any future version of the Local Plan.

8. Sites which have previously been considered but have now been ruled out: We have been extremely concerned that publication of the Local Plan appears to be seen by some (including some Councillors) as an opportunity to put back into play sites which have been very clearly ruled out, with a complete lack of clarity as to rationale or justification. This is very disturbing. If any alternative sites are to be seriously considered it is essential that they are properly researched and consulted. Ad-hoc solutions which have not been robustly researched or objectively and openly arrived at would not be acceptable. There must be a commitment not to re-consider sites which have previously been under active consideration (i.e. some of the sites designated "EPP - ..." during earlier consultation rounds) but then have been ruled out in the current Local Plan. Developers and landowners and mere availability must not be allowed to dictate site locations.

Q7 Recreational Facilities

1. Loss of recreational facilities: We are concerned that the proposed use of sports centres and sports grounds for housing follows the pattern of the closure and non-replacement of adult education centres in the area. With a High Street where estate agents offices are replacing shops there will be fewer reasons to spend leisure time in the town. The people of Epping are being called upon to make sacrifices so that developers may prosper. The current Local Plan is unacceptably woolly about the provision of replacement facilities when existing facilities are taken over for housing. The Plan would only be acceptable if there were binding commitments to replace with better, in Epping, before the existing facilities are closed.

Transport

2. Consideration in the Local Plan: The Plan is ridiculously unrealistic about current transport issues, and the consequential impacts in such areas as pollution and commuter parking in residential roads. It is fatuous to take the line that this can be considered as a separate matter, outside the context of the Local Plan. A joined-up approach is mandatory. It is patently obvious that building more housing must inevitably increase the pressure on local transport, notably of course the roads. However, the Plan says nothing creative or remotely helpful. Arguably this is out-and-out negligence.

3. Road traffic: There is no useful discussion of road traffic in the Plan. We do think that, given the traffic congestion already evident in Epping, and the level of traffic flow through the town - even early on a Sunday morning - it is not good enough to consider major development plans for the town separately from the traffic consequences of those considerations. If we look at current traffic levels and patterns, together with their environmental consequences, in our opinion that would be sufficient evidence to show that no substantial further development in or around Epping can be justified, nor could it possibly be claimed to be "sustainable".

4. Car parking: There have been some useful discussions regarding the idea of building on or over various car parks. We think the clear conclusion must be that whatever is done, the number of car parking spaces must not reduce, and in fact the opportunity must be taken to increase the availability of off-road parking. Also there needs to be rigorous planning of the building work to ensure that entire car parks are not put out of use while the work is done - notably of course those at Epping Station, behind the High Street, and at the District Council offices. Furthermore, to the District Council must provide off-road parking for anyone working at their offices in Epping, whether temporary or permanent staff. At present EFDC is part of the problem, not the solution.

5. Rail services 1: The point has been well made in several fora that it is nonsensical to have people from Harlow driving to and parking in Epping for the Central Line. We accept that this is not within the control of EFDC, but they do need to show willingness to work actively for the obvious solution.

6. Rail services 2: In the same vein, EFDC should make it a key priority of the Local Plan to implement a commuter interconnect at Epping station with the Epping to Ongar line. This has been talked about for long enough. It must be deliverable. This would be a concrete step towards getting traffic off the roads.

Sustainability

7. Definition: This word appears to mean all things to all people; it is being bandied around endlessly, and is being used to justify anything. As such it is currently meaningless, and we have found nothing in the current draft of the Local Plan which could be genuinely described as a thoughtful, positive contribution to sustainability. If we take one definition : "Sustainable development is about finding

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better ways of doing things..." (Source: the Sustainable Development Commission), then it can be said that there is no hint of sustainability anywhere in this Local Plan - it is just more of the same-old same-old. If the word is to be used in future editions of this plan, then EFDC should give a clear definition of what they actually mean by it, and then show metrics and examples of how their Plan actually delivers it. In particular the sustainability metrics should focus on how much the Plan contributes, inter alia, to:

- Improvements in the Forest environment and ecology
- Reduced road traffic
- Reduced congestion in Epping High Street
- Reduced environmental pollution
- Increased levels of cycling and public transport usage
- Reduced energy consumption
- Reduced on-street parking

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