

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

Stakeholder ID	2737	Name	Leonard	Beschizza On behalf of Protect Nazeing Greenbelt Group
----------------	------	------	---------	---

Method	Letter
--------	--------

Date	18/1/2017
------	-----------

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: ldfconsult@eppingforestdc.gov.uk

Letter or Email Response:

Protect Nazeing Greenbelt Group 1. Strongly Disagree Whilst we agree with the vision, we strongly disagree with its proposed implementation as it does not meet the objectives of the vision. It is apparent that EFDC have set out to build on Green Belt land parcels in many villages and towns whilst not giving due consideration and determination to build where possible on available, previously developed or brownfield sites. This is contrary to two of the broad principles included in the implementation of EFOC's preferred approach: -Maximising opportunities for development on previously developed land within the existing settlements of the District and -Utilising previously developed land within the Green Belt. Building in towns and villages where the existing infrastructure such as roads, sewers, drains and flood defences are inadequate and generally difficult to improve is essentially unsustainable. We need jobs and business growth but more thought needs to go into where particular businesses might be placed so as to minimise aspects such as heavy lorry movements through rural areas on inadequate roads or near congested junctions. Much of the distribution of housing and jobs appears more of a short term fix rather than a coherent strategy for the future. The Local Plan contains considerable detail on proposed buHds but information on infrastructure requirements, mitigation proposals and funding to support the housing growth are far too general, lacking in concrete proposals and difficult to find. The plan for the local towns and villages appears to provide dormitory housing for those who will commute some distance to work both now and into the future thus increasing unsustainability. Many villages and towns will see a significant deterioration in the environment and in the quality of life if the plan goes ahead in its current form. The approach may take the pressure from the Government off EFDC in the short term, but the expediency will lead to more of the same into the future. It will lead to unsustainable levels of people moving into the District. A much bolder and braver approach should have been taken.

2. Disagree We disagree in general with the approach and in particular the way it has been carried out. We do however support the building on and extension of Harlow with its existing infrastructure of roads, utilities, areas of employment, schools, shopping areas, bus routes, and access to the motorway network and rail as it will be more sustainable. However, rather than spread so much housing throughout the district a start could have been made on a new town or garden village with incentives for commercial and employment development, well planned infrastructure and transport links. By adding housing to towns and villages where the infrastructure is old and inadequate e.g. overloaded roads schools, poor bus links and far from transport hubs we are increasing the problems and disruption for existing towns and villages. A New Town approach

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

Stakeholder ID	2737
----------------	------

Name	Leonard
------	---------

Beschizza On behalf of Protect Nazeing Greenbelt Group
--

may be more expensive initially but would pay dividends as we move forward. Whilst this may have involved building on some Green Belt it would in the long run be more sustainable. Generally the small towns and villages are stuck with the roads systems that they have due to the piecemeal way that they have evolved, so that further expansion and development can only exacerbate any congestion problems. It is very disappointing to see an apparent lack of will to build on brownfield or previously developed land within settlements which would be of benefit to those communities. Indeed it appears that a strong bias has been built into the site selection methodology to give proposed Green Belt land parcels on the edge of settlements a clear disadvantage. Much of our Precious Green Belt could have been saved. A great opportunity will be missed if this all goes ahead. We have to conclude that EFDC has taken a short sighted and cheap option where it seems that they have been opportunistic in taking a very large number of Green Belt parcels on the periphery of settlements which are easier to develop, can be tacked on to existing creaking infrastructure and where developers are willing and apparently able to start building. We would add that the rate of construction is largely constrained by the availability of good skilled labour and that making so much Green Belt land available quickly will not necessarily lead to an increased rate of building. Reference to land made available for building and the rate of building across the country supports this. In England alone there are planning approvals for approximately 475,000 homes and whilst the big developers completed nearly 45,000 homes across the UK they had planning permissions for 278,000, with further land holdings for another 275,000 (Source :Daily Telegraph Business 16 Nov 2016). We would argue that the greatly inflated housing figures (OAHN) are encouraged by unrealistic growth predictions across the entire (SHMASA) largely driven by the 'Stansted Corridor' and the (SELEP) South East Enterprise Partnership. 3.No Opinion However, the approach of building onto a centre with more easily developed and expanded infrastructure such as local centres, local employment sites, schools, shopping etc with good road and rail links will make this a much more sustainable option into the future although it would require development on Green Belt. We would reluctantly accept this as a better compromise than multiple incursions on Green Belt in small villages that would inevitably lead to their future urbanisation and destruction of their rural character. 6. No No. We do not agree with the proposed housing sites in Nazeing. We strongly object to the proposed sites for the following Reasons: 1.GREEN BELT. The sites that have been selected for Nazeing housebuilding are all on prime Green Belt Grades 13 Agricultural Farm Land apart from one small site on previously developed Green Belt. In allocating these Green Belt sites, EFDC has ignored Government guidelines in the National Planning Policy Framework (NPPF) which states: "Allocations of land for development should prefer land of lesser environmental value" and "encourage the effective use of land by reusing land that has been previously developed or brownfield land". (Ref: Core Planning Principles Page 12 Para. 17 and NPPF Paragraph 80). The Minister of State for Housing sent a letter on 7/6/2016 to Members of Parliament which stated that "The Framework (NPPF) makes it clear that inappropriate development may be allowed only where very special circumstances exist, and that Green Belt boundaries should only be adjusted in exceptional circumstances, through the Local Plan process and with the support of local people". In the Community Responses to development (Questions 43 to 47) the principal reason for objection was towards building on Green Belt. For the NAZ-B area where building is proposed 73% of respondents objected, the other areas were NAZ-A 66% and NAZ-163%. It also states that where respondents supported development NAZ-1 and NAZ-A were favoured because the change of use from glasshouse and small industry would reduce the intensity of HGV traffic and improve the character of the area. Building on NAZ-8 described as of landscape importance by the Lee Valley Regional Park will achieve the opposite of this. EFDC HAVE NOT PROPERLY CONSIDERED THE VIEWS OF NAZEING RESIDENTS ACCORDING TO THEIR OWN SURVEY .AND ACCORDING TO GOVERNMENT POLICY. THEY HAVE NOT BALANCED THE VIEWS OF RESIDENTS AGAINST ANY REQUIREMENT FOR DEVELOPMENT. EFDC have said that their preferred approach reflects the broad principles as shown in the Sustainability Appraisal Report 8.2.1 page 23. They appear to have ignored numbers 2 and 4 in Nazeing which are: - Maximising opportunities for development on previously developed land within the existing settlements of the District and -Utilising previously developed land within the Green Belt. Out of the 46 sites put forward for consideration in the draft plan for Lower Nazeing over 30 have been previously developed, mainly as glass house sites which due to their small size are unsustainable and are now of limited economic viability. Many of these are derelict or semi-derelict and also inappropriately adjacent to housing within the curtilage of the village. Although many are still classified as Green Belt Agricultural land grades 1-3 the land has effectively been built on and cannot sensibly be considered of "high environmental value" or used for food production other than as small uneconomic units. The Lea Valley Growers Association in their report 'The Future of the Lea Valley Glasshouse Industry' states 'Allow derelict sites to be developed for residential housing or other commercial uses, where it can be shown that the existing use is not financially viable'.

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

They have put forward the following sites: •Sedgegate Nursery, Sedge Green (SR-0010) •Leaside Nursery, Sedge Green (SR-0246) The modern economic automated glasshouses now being built in Nazeing are on a much larger scale. A once in a generation opportunity has been missed to develop housing on these sites which are an eyesore in an otherwise attractive village. Recent planning applications for Green Belt sites on and neighbouring the chosen Green Belt sites SR-0300c, SR-011 and SR-0473 were rejected as the proposed developments "would have a detrimental impact on the character and appearance of the countryside". (ref. Reason 2 for rejecting planning application EPF/0937/16). The land borders the Lee Valley Regional Park where it can be viewed from Clayton Hill within the Park. The Park objected to a previous application on these sites "on the grounds that it would adversely impact on the permanence and openness of the Green Belt and compromise the landscape setting of the Regional Park". The adopted Park Plan identifies the majority of the site as part of a larger area designated as "Rural Valley Sides" in recognition of its landscape importance to the setting of the Regional Park at this point. This policy designation is retained in the Park Development Framework proposals and the Landscape Sensitivity Study. See Lee Valley Regional Park Authority Report no ULV/102/15 Oct 2015 For the Local Plan to classify this land as having no impact on the Green Belt and of being of low sensitivity calls into question the basis of their assessment. WE CONSIDER THE EFDC ASSESSMENT OF THIS LAND TO BE UNSOUND. THE BASIS OF THEIR DECISION SHOULD BE REASSESSED BY THE INSPECTOR. In the context of Lower Nazeing "no exceptional circumstances" have been demonstrated to alter the Green Belt boundaries when there is adequate scope for building (more than the stated requirement for housing) on previously developed land which would also be sustainable due to its position within the settlement (see Section 9 Protecting Green Belt Land NPPF Para 83). There is no justification in altering these boundaries when there are reasonable alternatives and the government has clearly indicated a presumption in favour of using previously developed or brownfield land. The EFDC has completely ignored the wishes of the Nazeing villagers in this Drafting of the Local Plan. The results of the Q&A survey COMMUNITY CHOICES carried out in 2012 demonstrated that the villagers above all wished to retain the Nazeing Green Belt as it stands. 2. CHANGE IN CHARACTER. According to C3.6 1. VISION AND OVERVIEW the Draft Local Plan states "Nazeing will maintain its rural character". The proposed developments will change this. Developing to the South of Nazeing as proposed will make a big change to the perceived character of this part of Nazeing. The sites will be viewed by many people on a daily basis when travelling into and out of Nazeing. In addition the many walkers, cyclists (some tourists and many from London) using the footpaths across Clayton Hill, in the Lee Valley Park, will view much more of an urban landscape looking North East/East rather than long established farmland and countryside. Similarly, the rural character of Middle Street and its setting, which is the most attractive of the village streets would also be completely changed as the area to the South of Middle Street is particularly open and unspoilt (site SR-0300a and SR-0300b). We believe developing on these Southern sites will be harmful to the settlement character and the Green Belt. These sites should be preserved as Green Belt. The sites SR-0011 and SR-0473 slope quite steeply towards the road, so any buildings would have a much greater impact on the scene than if the land was flat. We understand that sports pitches may be created on this land. Due to the topography this will require considerable terracing, permanently changing its character. The North and East is deemed less sensitive in Green Belt and landscape terms Some development to the North and East neighbouring the site SR-0150 could be developed with only very marginal encroachment towards Harlow (site SR-0434). Much of the land in this vicinity of Sedge Green has glasshouses, horticultural nurseries and garden centres which interrupt the openness of any views of the countryside to the North East. The views from the North East from the area of the Church at Betts Lane will be very little changed as they already include glasshouses and some derelict buildings towards Hoe Lane. Some development to the West behind North Street and Pecks Hill on the proposed Nursery sites on lower performing Green Belt (e.g. sites SR-0064, SR-0427, SR-0160) would have little impact as they cannot even be seen from the East or indeed only from Nursery Road. Any housing on those Nursery sites will have very little impact. The views in the South from Clayton Hill and those entering the settlement have far more value as the openness is currently not interrupted; but most particularly because they can actually be enjoyed by so many more people on a regular basis. St Leonards Road The vision in Question 1 of this pamphlet refers to protecting Epping Forest District's Green Belt and Environment. The Draft Local Plan also states in its introduction "Nazeing will maintain its rural character". The Plan does not meet these objectives. EFDC propose to alter Nazeing's Green Belt boundaries without objectively considering the merits of Green Belt land as against other land. The most likely reason for this is that developers are ready and willing to build on SR-0300, SR-0011 and SR-0473 quickly, thus enabling EFDC to meet government targets for house building. We object to this opportunistic approach as our Green Belt will not be safe for the future. Developers will target all Green Field sites adjacent to village and town Green Belt boundaries as an easy

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

lucrative option rather than redeveloping brownfield or previously developed sites. Photo 1-St Leonards Road. Sheep grazing on sites SR-0011 and SR-0473 Photos 2 - Middle Street. SR-0300a and SR-0300b 3. NUMBER OF PROPOSED HOUSES. The number of proposed houses in the Local Plan for Lower Nazeing together with other ongoing developments which already have permissions plus likely further developments will result in more housing than the existing infrastructure can possibly cope with. We could be looking at over 400 new houses. Overall EFDC have a requirement of 11,400 houses to be built 2011- 2033. Completions 2011-2016 will have been 1173, sites with permissions (31st March 2016) 1194 and wind falls between 2016 -2033 are 595. Strategic sites around Harlow will provide 3,900. This leaves approximately 4550 expected to be required. The sites currently selected for the District provide a capacity of 7200 approximately (source Sustainability Analysis 6.3.19 page 16). This leaves a large surplus of 2650 (over 50%). This would be a contingency for sites dropping out, not delivering plus others in reserve to cater for the NPPF requirement in paragraph 14 that for Plan making "the local plan should meet objectively assessed need with sufficient flexibility to adapt to rapid change unless:.... specific policies in this Framework (NPPF) indicate development should be restricted." "For Example...land designated as Green Belt" Footnote 9 to paragraph 14. We contend that as much of the selected land is Green Belt both in Nazeing and across the District this conflicts with the NPPF for Local Plans. EFDC have assessed the Lower Nazeing share of the 11,400 houses required in the plan as greater than 200. Nazeing already has a housing commitment of 85 with Planning Permissions (source ARUP Draft infrastructure delivery plan page 11figure 3.) The allocated sites have a capacity of 220, of which 33 are on a previously developed Green Belt site. This leaves 102. However, we are soon to get an application for over 50 houses on another previously developed site within Nazeing which would reduce the figure to 52 outstanding, less further windfalls. These could be accommodated on one of the previously developed nursery sites. Page 4 of 11 Taking all of this together we question the need to change the boundaries of the Green Belt in Nazeing especially as this requirement is not intended to be fulfilled until 2033 and bearing in mind paragraph 14 and footnote 9 above. We contend that EFDC are unnecessarily targeting the Green Belt for housing in Nazeing and many other locations and this is contrary to the NPPF.

4. SITE SELECTION METHODOLOGY The site selection methodology as implemented is unsound when applied to Nazeing due to the large presence of the Glasshouse Industry. We contend that it is unsound for the following reasons. Selection of Sites - Stage 2 of Methodology. • The method used for selecting sites has been given an inbuilt bias towards choosing prime green belt land for development in Nazeing rather than previously developed or brownfield sites. This is contrary to the guidance given in the NPPF Section 9 Protecting Green Belt land. 1.To check the unrestricted sprawl of large built-up areas 2.To prevent neighbouring towns merging into one another 3.To assist in safeguarding the countryside from encroachment 4.To preserve the setting and special character of historic towns 5. To assist in urban regeneration,by encouraging the recycling of derelict and other urban land •For the _Stage 2 Green Belt _asses_sment in the _Draft Local Plan, EFDC made a decision that individual green belt parcels over the whole district should not be assessed against green _belt purposes 5 and 3. Th s was based on the tonte_xt of the di.strict as a whole "which is predominantly rural in character and with limited derelict or other urban land in need of _recycling" (See note 5 page A21Appendix A of the Site Selection Methodology). However, in Nazeing,due to the historical glass house industry and gravel pit extraction, there is a much larger percentage of derelict and brownfield sites than in the rest of the district. Therefore, we challenge this decision in the conte)(t of Nazeing as it is inappropriate and deeply flawed. The result of this decision has caused a bias in the methodology used in Stage 2 such that prime Green Belt land is favoured for development over previously developed or brownfield sites. (NB. There is a Government proposal at the moment to amend the NPPF to give substantial weight to the benefits of using brownfield land for housing described as a "presumption in favour of brownfield land". Whereas the EFDC appears to have a presumption in favour of Green Belt land.) • A decision has also been made by the EFDC that some parcels of the district's existing green belt do not meet the purposes as set out in paragraph 80 of the NPPF. See note 6 page A21 Appendix A. No clear reasons were given for this despite Para. 4.25 of Appendix A Page A12 where it states that "the rationale for applying different weight to the criteria in relation to a particular site will be documented". The result of EFDC's decision is that the selection criteria 2.1"level of harm to green belt" score given to some Green Belt sites adjacent to the settlement in Nazeing is now 0 i.e."Site is within Green Belt, but the level of harm caused by release of the land for development would be none". The result of the above is that when comparing sites, Green Belt land inside the settlement which have had glasshouses built on them, some semi-derelict, are rated in terms of harm to the Green Belt as very low to medium if developed, but have been excluded because the Development would involve the loss of the best and most versatile Agricultural land Grades 1-3 (which is highly questionable), resulting in them being

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

rated as Category 7 (not suitable for development) in Stage 3, Step 4 even though they are in an urban setting. Whereas sites SR-0300a, SR-0300b, SR0300c, SR-0011 and SR-0473 which are unspoilt ploughed and farmed Green Belt land also agricultural land grades 1- 3 but adjacent to the settlement are rated as causing no harm to the Green Belt(!) and are thus considered to be Category 4 or less i.e. more suitable for development. This is perverse. Also in Green Belt Assessment Report Stage 2 by LUC in August 2016 the following two land parcels 067.4 (contains SR-0300a, b,c) and 067.5 (contains SR-0011&SR-0473) page 29, were assessed in terms of contribution to the Green Belt against purposes 1 to 4 of the NPPF. For purpose 3 (subsequently removed) these were all rated 'STRONG CONTRIBUTION'. The summary rating for harm to green belt caused by release of parcels was 'VERY HIGH'. We challenge the allocation of these Green Belt sites in Nazeing because they are particularly attractive parts of the countryside (see statements from Lee Valley Regional Park in 1.) they do perform functions 3&5 of the purposes of the Green Belt well and should be retained as there are other alternative sites which would have much less impact on the Green Belt. •In addition the process of comparing and classifying the different parcels of Prime Green Belt in this Draft Plan appears to be highly subjective and arbitrary. •Fully detailed reasons for rejecting many of the original previously developed sites on offer must be made available for scrutiny. •Rather than treating the planning as a tick box process, more consideration should be given to the individual circumstances relating to each site. E.g. Site SR-0583 has been derelict for over 40 years and the reason given for rejecting it is "site is located outside settlement buffer zones". This is too rigid an application of the guidance rules in the particular context of this site location which will result in the land remaining derelict for further decades. Whereas, it would make a better option for housing as it is also closer to the centre of Nazeing than all of the sites which have been allocated. This could be classified as "exceptional circumstances" for development. • Similarly, site SR-0160 which is no longer economical for its owner to run as a greenhouse nursery, and may also end up as derelict land, has been rejected by the selection method used because "it did not fall within the category of land taken forward based on the land preference hierarchy set out in the Site Selection Methodology" i.e. Grade 1-3 Agricultural land. However, the sites which have been allocated for development are also Grade 1-3 Agricultural Green Belt land which a cursory viewing would show as being of far higher agricultural and environmental value. There are many inconsistencies in the way the selection methodology has been applied. •Unsuitably derelict nursery land has not been chosen. Underused unattractive gravel pit infill has not been chosen. 46 sites appear to have been considered, the vast majority of which are previously developed sites. Of the 4 sites finally selected 3 of them are prime Agricultural Green Belt Grades 1-3. •It appears that these specific Agricultural Green Field sites have been chosen for development due to strong promotion by developers and their ability to deliver quickly. Consideration of the lands merit as Green Belt has been downgraded and given secondary consideration. This appears to be because the methodology, as altered and applied, gives a bias towards the use of sites within the Green Belt at the boundary with settlements. It is well known that speculators would prefer to purchase farmed and uncontaminated Agricultural Green Belt land with the hope of being able to develop it at a lower cost rather than to purchase previously developed land which would require clearing and/or decontamination. •If the methodology and reasoning employed in the development of the Draft Local Plan remains the same, the next plan revision will inevitably lead to further incursions into unspoilt Green Belt, and the previously developed sites will still remain undeveloped. •This Draft Local Plan falls short of the stipulations set out in Appendix A Site Selection Methodology - Reaching a view on preferred sites for allocation Page A1 Para.1.4 which states "To be adequate, the evidence base must be robust, assessments should be founded upon a cogent methodology, undertaken in a transparent manner and fully documented at key stages. Professional judgements require justification and site- selection decisions must be clearly explained". This criterion has not been met. Final selection of sites. The final selection of sites appear to have been carried out in workshops and informal discussion. The documented details of these are currently unavailable. Such processes should be transparent and therefore we ask that this information is made freely available for scrutiny. These include those on the; 7th Mar 2013, 4th July 2013, 7th Nov 2013, 5th Jan 2014 and particularly those on the 1st June 2016 and 5th of August 2016.

5. ALTERNATIVE SITES IN LOWER NAZEING. In light of the above in 1 and 4, we believe that the following sites should be carefully reconsidered. We ask this because EFDC has said that it is "our plan" so we believe that at this draft stage other options put forward should receive objective consideration. We therefore put forward these sites for the following reasons: They will meet the 'required' building capacity They are in sustainable locations They are not extending the settlement boundaries in a non-preferred strategic direction They will improve the character of their surroundings They will have no impact on prime green belt They are or have been developed land and are within walking distance of the centre of Lower Nazeing. These Sites in sustainable locations should be re-assessed due to bias

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

in the site selection methodology. SR-0583 Land SE of Paynes Lane in Nazeing Road (not assessed) - Once glasshouses but has been derelict for more than 40 years. Three small glasshouse sites bordering housing in North Street and Pecks Hill. They may be developed Green Belt but are in a predominantly urban setting within the settlement. SR-0064 Sedge Green and Chalk Hill Nursery, Pecks Hill (100hses) SR-0427 Nursery to the West of North St. off Lake Rd (168hses) SR-0160 Fernbank Nursery behind shopping Parade (73hses) The two further sites previously mentioned SR-0010 and SR-0246 are adjacent to SR-0064 They appear to have been rejected primarily because they are classed as Agricultural land grades 1-3 (as are the allocated sites) except SR-0583 which although closer to the centre than all of the selected sites was judged to be just outside settlement buffer zone. THESE PICTURES WERE TAKEN LATE 2014

6. OBJECTIONS TO AND DETRIMENTAL IMPACT OF SELECTED SITES ON INFRASTRUCTURE.

When selecting sites SR-0011, SR-0300a, SR00300b, SR-0300c and SR-0473 the inadequacy of the existing infrastructure has not been taken into consideration. Once built on, these sites could potentially be greatly expanded. An up to date high level impact assessment should have been carried out prior to any decision on selecting specific sites or groups of sites. The production of the draft Infrastructure Delivery Plan during the consultation phase so late (but dated September) is a major failing. This is unsound. The following potential impacts support this.

6.1. Flooding.

At present, a large volume of rainwater soaks into these farmed and ploughed sites. This would no longer be the case if they were built on. Due to topography there will be a higher rate of rainwater run-off and greater volumes of water entering the drains and sewers in St Leonards Road which are currently inadequate and in disrepair. This currently causes manholes to blow open spewing out sewage. In 2000 flood water entered the sewers and sewage entered houses in Middle Street and also St. Leonards Road near to the crossroads necessitating the occupants to find other accommodation whilst repairs and decontamination were carried out. Mitigation using catch tanks would be expensive both in building and in ongoing maintenance. There is likely to be, therefore, a higher incidence of flash flooding which already occurs in both Middle Street and St. Leonards Road and greater extensive flood risk where the Brooks cross underneath the roads. Flood alleviation should be tackled prior to development. The Draft Infrastructure Delivery Plan Page 154 states that "Nazeing Brook has the lowest standard of protection of all the Lee Valley tributaries". This is especially true of Sites SR-0011, SR-0300 and SR-0473 to the east of St. Leonards Road which slope down towards the road. From time to time, when it floods, St Leonards Road becomes impassable to cars. In 2000 the road was closed for over 12 hours. Photo 2 - Flooding Sewers. (FOR PHOTOS SEE ORIGINAL QUESTIONNAIRE DOCUMENT) The number of new houses proposed on the sites for SR-0300a and SR-0300 b and SR-0300c, SR-0011 and SR-0473 sites could increase the number of homes discharging into the sewers running along both these main access roads at the entry point by a factor of two. Bearing in mind the problems already described, they may well require replacement and significant upgrades.

6.2. Traffic.

St Leonards Road (B194) is a Priority Route taking heavy traffic and many HGV/LGVs. Its pavements are in constant need of repair due to the heavy traffic and the HGVs which mount the pavement (which is only on one side) to pass one another. The road is not adequate to take an even heavier burden of traffic which would occur if these allocated sites were to be developed. The Site Suitability Assessment 6.6 Traffic Impact for the larger allocated sites SR-0011, SR-0300 and SR-0473 along St. Leonards Road, where a new junction will be required, each state: "the area around the site is expected to be un-congested at peak time or site below the site size threshold where it would be expected to affect congestion". There is evidence which indicates the contrary. It is a busy priority route where long queues of traffic frequently build up at peak times past these sites (see Photo). If a new community hall is located here then this will also significantly increase traffic. The Draft Local Plan reference to traffic here is frankly risible. The cumulative impact of all three sites together with a community centre should have been considered with regard to the threshold size as they will all use the same access point. In particular the impact on Nazeing crossroads will be very high. No new impact assessment/transport survey/assessment is apparent for this site group. This is unsound. Photo 3 traffic St Leonards Road (FOR PHOTOS SEE ORIGINAL QUESTIONNAIRE DOCUMENT)

6.3. Schools.

We understand that, currently, the local primary school has 60 pupils in temporary accommodation (source: letter from Essex CC Infrastructure Planning Officer to EFDC Planning on 6/6/2016). The secondary schools in Harlow(OI) are some 12km away and have a forecast of a significant deficit of school places of 305 for 2019/20 (page 56 of the Draft Infrastructure Delivery Plan). They would be unable to take in the number of extra pupils so parents would have to find school places elsewhere including Hertfordshire thus increasing cars on the roads or necessitating significant travel by public transport which is poor from Nazeing. This would mean greater cost and inconvenience for parents and pupils alike.

6. COMMUNITY FACILITIES

In Chapter 5 of the Local Plan under Nazeing Vision page 165 it states that a new community centre will act as a new focal point for the village. Of the sites selected, those adjacent to St Leonards Road are the most likely as

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

this has already appeared in previously rejected planning applications. This is a poor location for such a facility as it will act as a magnet for traffic, not just from Nazeing but from other areas. It should be borne in mind that Nazeing is three settlements Lower Nazeing, Bumbles Green and Keyzers estate area.

Only a few people will walk to the site, most will drive. The proposed site is on a busy priority route as already stated and is dangerous for crossing and pedestrians particularly children as the pavements are inadequate and only on one side of the road.

•C3.6 KEY ISSUES states "There are limited community facilities in Nazeing and there is a

need for new facilities for young people".

•The closure of the Lido pool in Broxbourne was a great loss, but a new pool is envisaged for Waltham Abbey.

However, there is already provision in Nazeing for: football(8-16yrs), cricket, badminton,fitness, yoga, pilates,aerobics, dance (4.S-15yrs), karate,sailing,wind surfing,cycling, zumba, scouts(10.5-14yrs), guides(10-15yrs), cubs(S-10.Syrs), brownies(7-10yrs), rainbows(S-7yrs), dog training,golf, rowing,country park, fishing, horse riding,remote control boats, childrens' play areas and a childrens' playgroup.

More facilities are provided in close neighbouring towns.

•There are 5 community halls: St. Giles church hall, Congregational church hall, Bumbles Green Leisure Centre, the Scout hut and the Nazeing Primary School Hall where activities take place. Also there is the Golf Clubhouse which may be hired for events. Having 6 venues rather than one in the village is a bonus as all 6 can have different activities going on simultaneously. A new community hall could end up as a "white elephant" and be a burden on the Council Tax payers. The site in St. Leonards Road, which has been suggested by a developer for a new hall,would not be a suitable location. A site for youth activities must be "safe and secure". (See Epping Forest Open Space, Sport and Recreation Assessment June 2012). It is an unsafe busy Priority Route used by many HGVs. Children would have to cross a dangerous road to access the hall.

7. UNSUSTAINABILITY

•No great local need for housing on this scale in Nazeing has been demonstrated. Most people would use their cars to commute to work in other areas and to use the railway station at Broxbourne to go to London for work as there is very little highly paid work locally to enable them to afford properties on the proposed sites. The Glasshouse industry employs low paid mainly migrant workers who generally live in temporary accommodation provided by the sites.

•People will use their cars to travel to and from local facilities as it is too dangerous to cycle and it would be too far from the shops for most people to walk. As stated the effect will be significantly increased if a community centre is built here as this will generate traffic from other areas.

The lack of Public Transport is forcing people to use their cars.

Bus Network

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

The deteriorating availability of bus services particularly in rural areas is promoting the growth of car dependency and the consequential increase in traffic, congestion and pollution. We understand that by January 2017 the Bus Services for Nazeing will be almost non-existent.

Transport for the elderly and frail to access key services and for shopping should be more easily available. Provision of on demand services should be expanded.

Walking and cycling.

Cycling in many EFDC villages is not really safe enough due to narrow roads, volumes of traffic and heavy lorries. However, improvements to pavements and provision of safe crossing points in many villages with schools, shops, community facilities etc would encourage the levels of walking. There should be some funding from new developments to assist this.

Utilities.

In the case of utilities (draft policy P3) it is essential that comprehensive assessments are now undertaken in a timely manner to ensure any necessary upgrading particularly for sewerage, drainage, flooding prevention and water supply are carried out prior to development. Clear and transparent procedures and responsibilities for assessments and delivery which are adequately overseen must be in place before the plan is adopted and individual developments are approved. Maintenance provision for some infrastructure needed on new sites e.g. flood prevention, is vital as they are not often needed. For example periodic inspections, repair and maintenance.

Where Community Infrastructure Levies (CIL) are imposed for upgrading utilities they must be spent as far as possible on the mitigation of impacts of the development on the local and neighbouring properties e.g. where sewers need upgrading. There needs to be a commitment from EFDC that these funds are not spent elsewhere.

Flooding

Developer contributions should be sought for surface water and flood alleviation and management measures where developments are in or near areas prone to flooding. These should include measures to stop any consequent impacts on surrounding properties.

Due to the long timescales for reducing flood risk EFDC should give a very high priority to seeking funds from government agencies for major flood alleviation works. Nazeing Brook has the lowest standard of protection of all the Lower Lee tributary rivers and over 180 properties are at risk of a 1% annual probability event. (Draft Infrastructure Deliver Plan Para 12.1.1 page 154 and 155 Fig 100). The Lower Lee Flood Relief Channel could only withstand a 1 in 20 year flooding event.

Education.

In communities where education provision has already reached or is approaching critical levels particularly Primary Schools in villages a properly informed impact assessment should be carried out well before the plan is finalised, as in some cases significant extensions to schools or a new school may be needed which will have a long lead time or may not be practical in some locations. In particular more Green Belt may be threatened if additional schools are needed. The ARUP assessments in IDP appear incorrect.

Developer contributions are an important source of funds particularly for village primary schools and childcare facilities impacted by new developments. The schools should not lose out to other infrastructure requirements.

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

Assessments, finance, responsibilities and procedures must be in place prior to the commencement of development in the Local Plan. Levies should be spent on the impacts of the particular development from which they are derived.

9. There appears to have been inadequate depth of research and investigation into producing the local plan for Nazeing. Draft Policy P10.

As a general comment for Nazeing and villages the deteriorating availability of bus services is promoting the growth of car dependency with its consequential increase in traffic, congestion and pollution. It also isolates some elderly people.

We would ask why hard copy questionnaires with return envelopes were not posted to all elderly residents, as many of our ageing community are not computer literate.

The structure of the documentation of the plan and its complexity seriously compromised the ability to find detailed information which made making any detailed response difficult in the extreme. This may have led to many unnecessary telephone calls, multiple on-line searches and people just giving up. Some simple and consistent numbering and indexing of each report to allow easier cross-referencing would have helped.

Our local Nazeing Parish Council could have been more pro-active in making information available and answering questions on the local impact by means of a properly publicised standalone meeting. Adding a meeting onto a normal planning meeting almost as an agenda item and only having a notice on the Parish Council Noticeboards did not generate much interest. Perhaps they should be given some guidance by the District Council. Hopefully other Parish Councils treated the Local Plan with a great deal more importance and communicated more openly with their residents.

(PLEASE REFER TO ORIGINAL QUESTIONNAIRE DOCUMENT FOR THE SIGNED PETITION)