

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

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| Date | 12/12/2016 |
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Letter or Email Response:

General comments The development sites proposed in the Draft Plan seem to place an unsustainable strain on the district's green spaces, transport infrastructure and essential facilities. This seems to particularly apply to the developments proposed for Loughton and Epping, and in my view much of the housing need should instead be met by the creation of a sustainable new town elsewhere in the District. As they stand, the proposals inevitably either place homes in relatively inaccessible locations on the edge of existing settlements, forcing their residents into unsustainable car dependency, or result in the loss of essential urban green space that would significantly harm the character and sustainability of the existing settlements. The policies in section 4 and 6 seem to have been largely ignored in the process of finding sites for section 5, which makes the Plan as a whole self-contradictory and un-implementable. I believe this makes it quite likely that if published unchanged, the Plan would be found to be unsound, with worrying consequences for the council's ability to control development across the district. Draft Policy SP 1 Presumption in Favour of Sustainable Development It needs to be more clear that a reason to reject a development proposal, regardless of its otherwise according with the development plan, would be because it was not sustainable (in economic, social or environmental terms). Draft Policy SP 4 Place Shaping B.ii I disagree with this policy: high density along transport routes could be taken include along main roads. High density housing is not appropriate in main roads for reasons of health and the environment. Noise pollution is higher, as is air pollution. This policy would encourage unsustainable ribbon development that damages the character and sense of place of the existing settlement concerned. This paragraph therefore needs complete revision. Draft Policy H 3 Rural Exception Sites B. - should be more clear about the proportion of homes as discussed in 4.17: The Council will consider the provision of some market housing within a site (a small proportion of the total units in an application) if it can be demonstrated through open and transparent viability evidence that such housing is necessary to ensure the delivery of the affordable homes. Draft Policy H 4 Traveller Site Development B.ix Small sites within the Green Belt seem acceptable to me, as I do not believe there is any impact on urban sprawl or the openness of the countryside. As currently written this policy has the potential to unnecessarily constrain the Council from identifying sites that would otherwise be useful in allowing it to meet its obligations to the Traveller community. D. Would remove "unless it can be clearly demonstrated..." etc - this seems highly unlikely and could only encourage unnecessary applications bound to fail at cost to the council. Draft Policy E 2 Centre Hierarchy/Retail Policy A. I believe the Council should have an ambition to make Waltham Abbey a viable Town Centre, making the most of tourism opportunities discussed in E 4. It should therefore be categorised in this way, on the assumption that the Council will succeed in bringing appropriate development to make it a better established and more prosperous shopping and commercial centre. The scale and type of development appropriate to Waltham Abbey is not significantly different to Epping and Loughton High Road - and in some ways more substantial

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development is in fact called for. The Review mentioned is useful in understanding the present situation, but the change suggested does not reflect the potential for development over the lifetime of the Local Plan. Draft Policy T 1: Sustainable Transport Choices There should be mention of cycle parking provision in this policy. This is particularly applicable to higher-density development. D-iv is completely inadequate policy except as far as low-density development is concerned, and only seems to encourage development that promotes car-use and does not meet the goals of moving to a low-carbon economy, reduces car travel (per 4.83) and provides real choice for new residents. Draft Policy T 2: Safeguarding of routes and facilities There should be mention of the local Cycling Action Plan, i.e. to ensure that development does not prevent its implementation (once that plan is approved), and that associated highways schemes include safe cycle routes, separated from general traffic on roads faster than 20mph. Draft Policy DM 8 Heritage at Risk While I support this policy, it does not sufficiently cover the proactive work that the council should be doing in order to monitor and enforce the conservation of at-risk assets by owners. Although at this time resources may be limited for such work, the council must ensure its policies allow it to act on its own initiative where problems are brought to its attention. Draft Policy DM 9: High quality design Aiii should be broken into two points: sustainable construction techniques must be considered separately from whether the final building is sustainable e.g. low-carbon, water-efficient, etc. Both are important, and the one does not imply the other. See also comments on P 2. Draft Policy P 1 Epping i SR-0069, ii SR-0069/33 and iv SR-0113B - I have concerns about the scale of development on these three sites, specifically regarding: (a) flood risk, and (b) the feasibility of providing sustainable transport to such large developments. On the latter point, Ivy Chimneys Road and Brook Road are already unpleasant to walk or cycle along; combine that with the distance to the town centre, and driving would be the most likely transport choice. This would cause increased traffic jams and further damage the character of the town centre. Draft Policy P 2 Loughton i SR-0226 / ii SR-0227 - the developments proposed for the Underground Station car parks are clearly quite high density. There is very little policy in the Plan (e.g. in DM 9) to ensure that such developments contribute sustainably to the town's sense of place. For example, ensuring high quality, locally-supported design by actively involving parish councils in running architectural competitions; providing safe and secure cycle parking (see also T 1); and ensuring that large developments containing many units have a long-term, economically-viable plan for maintenance of shared facilities such as lifts, stairwells and grounds. There may be scope for significantly higher-density development in Loughton on sites not mentioned in the Draft Plan. One such site is the Fire Station and neighbouring medical centre, which if redeveloped with an architecturally-interesting medium-rise (or even high-rise) building (that retained the fire station & health centre underneath) would contribute positively to Loughton's development as a thriving centre. iv SR-0356 - the scale of development on Borders Lane Playing Fields (Lucton's Field) is inappropriate. The local community would be deprived of a significant amenity for health and recreation. I could support limited development, with fewer units than proposed in this Draft Plan, as long as significant open space was retained. This is the only (de facto) public open space within easy walking distance of that part of Loughton, and its loss would negatively affect residents of the Broadway and of the Deepdene Road / Colson Road area. The council should use the Local Plan as an opportunity to ensure that significant community benefits are achieved from any development, e.g. construction of sporting facilities and a play park. v SR-0358, vi SR-0361 - Rochford Green and Jessel Green are very important green spaces on the Debden Estate. I do not believe that any development here should form part of District Council policy or the Local Plan. Providing access to green space is important UK government policy, and also Essex County Council policy. Public Health England published research [1] that highlighted a number of positive health outcomes from access to green space, and consequently the potential for serious negative impact should that space be lost. Access to this type of green space is very important for getting children active, for dog-walking, for adult fitness, and for general recreation. These greens also provide a venue for community activities (for example children's activity days run by the District Council). The estate was specifically designed with green space amongst the houses, because of the clear benefits to public health, not least mental health. The proximity to local schools (e.g. Hereward Primary) mean that in practice this land is well-used by the community, especially at certain times of day. The character and sense of place of the entire estate would be severely damaged by any development on these two sites. The views from Jessel Green of the surrounding countryside are in themselves valuable and worth preserving via planning policy. That is not to say that the council could not make better use of this land (for example by managing the sites better for wildlife and/or providing additional opportunities for recreation). Much of the open land within walking distance of this part of Loughton is private, is thus not accessible to members of the public and therefore derives little or no health and recreational benefits, which makes these urban green spaces even more essential. The Council should offer residents certainty on these sites by withdrawing these sites from the Draft Plan, and agreeing to designate them as Village Greens (or via

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designation as Local Green Space). The education and health infrastructure is not capable of supporting this many new homes, and there is no evidence in the Draft Plan that sufficient school capacity (for example) could be provided in support of this level of development. Draft Policy P 8 Theydon Bois i/ii/v - I do not believe that large-scale development on these sites is appropriate. SR-0026B is particularly inappropriate - this is valuable green belt land, important to the setting and sense of place of the village. I do think that some development to the east of the railway line makes sense, given the location's excellent access to public transport: SR-0026C could take some homes, but not the number suggested in the present Plan, which would be too high-density and inappropriate for the character of the village. I do support development of SR-0228ii, especially as that site is much-used by people parking their cars to avoid paying at the official station car park.