

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

Stakeholder ID	3989	Name	Charles Geddes
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Date	12/12/2016
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Letter or Email Response:

I thank you for all your hard work that has gone into this essential plan. The email version will make my letter slightly less arduous to process -thanks! The vision as written on the first page of the questionnaire cannot be argued with. But, as for the some of the rest is concerned, I can't agree! The Draft Local Plan questionnaire, as published and the on-line version is very simplistic. I am concerned that should anyone feel moved to look at the 200+ page document and the parallel evidence base they will immediately give up! This will lead them to concur with your leading questions and suggestions which, on the face of it, are reasonable. I feel that a more accessible document should have been prepared that enabled the vaguely interested resident to make a more informed response. I accept the requirement for the 'full' document . I am concerned that "potential development" - in addition to site proposed in the OLP. This phrase is only used once in the whole of the OLP main document. Has it been deliberately avoided? In paragraph four on the EFDC web site for the OLP? <http://eppingforest.consultationonline.eo.uk/our-draft-local-plan> you state "If you are interested in putting a site forward for potential development please download this 'call for sites' form and return to the Epping Forest District Council." Owners are inevitably going to add more sites into the OLP - but 'we' - the consultees don't know which ones from the ARUP report they will be. Possibly other sites will be offered. I am not happy with this arrangement as there will not be any more consultation and these sites are requested for delivery 2011-2033! I do not agree with SP2 - The amount of developments proposed for the area in and around the Epping Town is completely disproportionate to the sites elsewhere in the District. I have read that the intention is to develop towards the London - M11- Cambridge corridor. I can see no need to load our area when there are other viable sites south and north by the M11. However I am not convinced that there is any need to develop towards this spurious corridor. Policy SP 4 Place Shaping. I do not agree with this policy. In 3.78 you say "The appreciation of housing density is crucial to realising the optimum potential of sites" This is right but when you give possible numbers for the proposed sites the type i.e density of the 'houses' is almost never defined. I accept that flats are mentioned on occasion. BUT you must use sites to their FULL potential if they are developed. This would be flats even to the height of four storeys if this does not overbear neighbouring residents. Working 'smarter' will help achieve a larger number of units. It will also mitigate the amount of Green Belt that is taken. Policy SP 5 - Green Belt and District Open Land in OLP page 49 - Proposed Green Belt boundary alterations. I do not agree to this plan. At point 3.97 it states "The extent to which safeguarded land will be required is not yet clear and will be the subject of further consideration prior to submission of the Plan for examination." This is all formally (well it still is) Green Belt land to be redefined. They "are not clear yet" but will be by the final local Plan submission! Another aspect we can't really judge. I understand that this re-designation came from the Green Belt Review Stage One - September 2015? But I am not clear what its purpose is. It is concerning to note that the area SR-0071 (land at Stonards Hill) - approximately 115 homes - is at present Green Belt.

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However the rest of the Green Belt area named Epp-A in the 2012 Consultation document is now re-designated as shown on the map page 49. On Page SO - "District Open Land" B. it states "The same level of protection will be applied to areas of District Open Land as is applied to Green Belt. The key characteristics of District Open and are their openness, local significance, wildlife value and/ or public accessibility. It is not necessary for each of these characteristics to be present to be designated or retained as such." This is unclear - what is the point of changing? It leads to one suspect dissembling. Policy SP 6 The Natural Environment, Landscape Character and Green Infrastructure. I have concerns with the 'evidence' supplied by the feedback from the Consultation of 2012. This is shown in the pre policy summaries - "What you told us?" Demand for infrastructure was very high at that time. This does not seem to be reflected in your wording. Equally the protection of Green Belt was very high on people's conversations at the time. I feel these concerns continue, given the attendance at two meetings - recently and early in the year at Epping Hall. I am disappointed that you do not make it clear that the supply of certain infrastructure and services is the responsibility of Essex County Council. Fully researched costings and time frames for major projects should have been provided for each community area. It has been over 4 years since the public view was last sought. The lack of any details makes the published Draft Local Plan too vague and cannot be agreed. Section 6.23 specifically refers to the possible relocation of Princess Alexandra Hospital and its replacement may well be proposed for Green Belt land as this is allowed under the rules that protect Green Belt. These rules also allow schools and roads on the Green Belt. This has not been made clear in the document - the additional infrastructure will almost certainly take more Green Belt. D 1 Delivery of Infrastructure A. I feel that the policy is not firm enough to ensure that exceptions are not granted or commitments reneged. The wording must use more positive wording "will supply" "guarantee" "without exception" B. "where appropriate" and "will be sought from developers" does NOT give us confidence that these conditions will happen - similar to A above required. C. The same thoughts I want to see "should" replaced with "must" and "will". D. This section says "In negotiating planning obligations, the Council will take into account economic viability ." This is poor wording as developers could be granted permission if they convince that a project would not be viable with the imposed infrastructure. The weak wording leaves the community open to District granting consent contrary to assurances in A to C above. E. Same again sloppy - weak wording. My concern regarding Infrastructure delivery is not properly addressed in the DLP. If even half of the proposed nearly 4,000 new homes proposed in the Epping and surrounding settlements were built the existing, Epping centred, infrastructure would not cope. This issue and the delivery of it ahead of ANY developments has not been addressed. D 2 - Essential Facilities and Services I have similar issues with 6.22 "Developers will be expected, where appropriate, to make contributions .." This language is not strong enough. They "must" and "will" are the words needed. Policy D 3 - Utilities Well worded, I agree this policy. But I think high speed broadband should be included in with it. It is mentioned later but it is a utility. The District has increased working from home, entertainment and business that require this. Suggest 1Gb speeds should be aimed for as is being offered in London. This should not be a problem with encouragement from the District Council? Policy D 4 Community, Leisure and Cultural Facilities This policy is acceptable. The policy of developing Epping Sports Centre is good. Unfortunately there is no time scale to replace these facilities within Epping. The site itself would be suitable for flats BUT the replacement sports centre must be in place, in the town, before. Policy D 5 Communications infrastructure. I agree this policy but please aim higher the aspiration speed is too low - demand 1Gb speeds please. Policy D 6 Neighbourhood Planning. Agree this policy. Policy D 7 Monitoring and Enforcement. This needs to be expanded. From the published planning documents very little enforcement seems to be taking place. I understand that discussions may resolve issues without formal proceedings. However a robust attitude to planning is to be encouraged and declared. Infringements ranging from temporary advert signage becoming permanent to lack of on-site tree protection and retrospective planning applications being granted should be addressed. Policy H 1- Housing Mix and Accommodation Types. I broadly accept this - but feel that must demand that the design is to be of a high quality and this would INCLUDE scale. A design panel would be useful to decide on sites such as the hideous vast bulk of the former Half Moon PH. Policy H 2 - Affordable Housing. Again agree this, but given the comments over the last few years on homes for Epping children, ensure these go to residents first. H 3 - Rural Exception Sites. Agree this policy. H 4 - Traveller Site Development - Mostly acceptable but it needs to ensure that sites that are kept up to a reasonable standard or they must be reviewed and closed. There are cases where the creation of a 'site' is just a way of creating a permanent residence on Green Belt. See EPF/1993/13 Woodside Thornwood Policy E 4 - The Visitor Economy - agree good policy. Perhaps take seriously your offer (development site) of the present EFOC offices as an ideal site for a hotel? This could then be shared with the staff along with the development of home working and multi-use office space. It is a great location and existing building is suitable for hotel conversion. DM 4 "Suitable Accessible Natural Green Space and

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Corridors" is not strong enough to protect our Green Belt. Suggest keep the existing designation. i.e do not implement the proposals details in SP 51 DM 7 "Heritage Assets" policy F "material consideration" this phrase suggests you will read information and take it into account. However, local buildings local listed are very important. These buildings should have the same protection as statutory listed ones. The phrase "the Council seeks to retain" is too weak. Epping and no doubt other communities have lost Locally Listed buildings in the last 2 years. The Old Bakery (Pearces) and The Half Moon Pub. other assets such as The Court House had no protection even though buildings by the same architect in Chelmsford have a Statutory Listing. The Friends Meeting House is locally listed. The Police Station is Building of Townscape Merit, thus has next to no protection. Suggest a new assessment of buildings. OM 9 policy E - yes good idea. However we need to know more details of the Design Review Panel - will it be from the community? Please at least say where you hope to draw the members from. Policy - DM 13 Advertisements. A good policy. Please strengthening it by removing long term usage of banners and sold/for sale signs. These litter our High Street as well as residential areas. The increase use of sandwich boards planted outside premises should be addressed. An 'arms war' of these seems to have developed. They are unsightly and hazardous. Policy P 1 Epping. Mostly sensible. But I think some effort and encouragement should be given to develop AI use. The predominance of A3-S is not good for the healthy mix. The use of Permitted Development should be restricted, perhaps by use of article 4 area designations, In areas such as The Orchards, Theydon Grove, Church Fields, Lynceley Grange and the new Buckingham Gate estate. These were designed as a whole and the vast majority of their residents appreciate the cohesive nature of them. Selfish inappropriate PD should be stopped - urgently! Comments on the proposed sites. I suggest these alternative sites. The police station would provide perhaps six flats but the present building must be kept. Small retail or a visitor centre on the ground floor and basement would be useful. The Bell Hotel site at Bell Common - not on the list but very large and relatively central. The old school site opposite the library is mentioned but not in any detail. This could account for a large number of flats and parking if it were designed with parking under retail and 3 storeys of flats above. These heights would only be appropriate in the central area. The present Travis Perkins is not really suitable for a Conservation Area. This could accommodate parking, retail and flats as describe above. Just outside the town there is the old MOD site in Woodside as well as the coachbuilding site at the junction with the B1393. Latten Priory is mentioned in passing in the DLT but I am not in favour of this as it is Green Belt. The area provides separation between the Epping/Thornwood area and Harlow. The negative impact on Epping in terms of transport, lines of sight and infrastructure would be major. Given the amount of work that has already been done in anticipation of this area being developed, I am disappointed that it is not detailed for this consultation.

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