

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

Stakeholder ID	3164	Name	Kathryn Richmond	Waltham Abbey Town Council
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Method	Survey
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Date	
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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](mailto:ldfconsult@eppingforestdc.gov.uk)

### Survey Response:

1. Do you agree with the overall vision that the Draft Plan sets out for Epping Forest District?

**Disagree**

Please explain your choice in Question 1:

Waltham Abbey Town Council feels that the 'Vision for the District' was aspirational but uninspiring; offering only controlled management of natural growth, without identifying any key strategy for the District as a whole. It is believed that there is very little strategic thinking in the document. We would like to see a stronger approach to regeneration within the document, including retail, employment, infrastructure, community, in fact, taking a much more holistic approach to the future of the town.

2. Do you agree with the overall vision that the Draft Plan sets out for Epping Forest District?

**Agree**

Please explain your choice in Question 2:

Waltham Abbey Town Council agrees with the overall intentions of the Draft Local Plan and feels the proposed distribution of sites to be, by and large, equitable. Waltham Abbey Town Council does have reservations as to the size of some of the proposed sites within Waltham Abbey, as our stated policy is to encourage smaller scale developments, and to avoid the creation of large scale estates, as per our response to the Issues & Options consultation.

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Richmond	
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3. Do you agree with the proposals for development around Harlow?

Agree

Please explain your choice in Question 3:

Waltham Abbey Town Council believes this is a sensible, sustainable approach, given that Harlow have expressed a desire for growth

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4. Do you agree with the proposed shopping area in...

Epping?

No opinion

Buckhurst Hill?

No opinion

Loughton Broadway?

No opinion

Chipping Ongar?

No opinion

Loughton High Road?

No opinion

Waltham Abbey?

No

Please explain your choice in Question 4:

Waltham Abbey Town Council most definitely does not agree with the proposed primary shopping area boundary change nor the downgrading of Waltham Abbey from Town Centre to Small District Centre. Waltham Abbey is the second largest town in the district and as such should maintain its status as a Town Centre. It is understood that Sun Street cannot attract large retail outlets due to the limitations of the historic town centre, but we believe that the town centre can become a bespoke retail/social space encouraging tourism and the visitor economy due to its historic attraction. Therefore we do not agree with the downgrading of the town to a small district centre, which will exacerbate the current trend of allowing the change of use on ground floors of buildings from retail to residential. The Town Council believes that the current retail frontage in Sun St is in peril of fossilisation and a slow death as the main retail attraction to the Town is away from the historic centre. We would also like to see stronger policies within the Local Plan supporting town centres. The proposed boundary amendment excludes two of the main retail attractions in the town, namely Tesco and Lidl. We contend that it is in the interests of the town to extend the declared boundary of the Town to encompass not only Tesco and Lidl (as currently) but also the whole of the Brooker Road Industrial Estate (EMP-0005). The Town Council will be actively promoting the future development of the site SR-0061B and encouraging businesses currently present in Brooker Road Industrial area to relocate, thus freeing Brooker Road for future development as a retail park, thereby keeping the retail function of the town close to the historic centre.

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5. Do you agree with the proposals for new employment development?

Disagree

Please explain your choice in Question 5:

This is impossible to answer with any degree of certainty, without sight of the conclusions to be drawn from the analysis work still to be undertaken. How it is hoped to get any meaningful feedback at this juncture is unclear. We also do not agree with part of Town Mead Leisure Park (SR-0382B) being identified as employment land, as Town Mead is under the protection of the Essex Act, so it is not appropriate to designate this as employment land, although we understand this has now been taken out of the Plan. It should be noted that the area currently used as a depot may be identified as employment land as it has been previously developed.

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6. Do you agree with the proposed sites in your area?

Epping (Draft Policy P 1):

No opinion

Please provide reasons for your view on Epping:

Loughton (Draft Policy P 2)

No opinion

Please provide reasons for your view on Loughton:

Waltham Abbey (Draft Policy P 3)

No

Please provide reasons for your view on Waltham Abbey:

iii) SR-0219 (Fire Station, Sewardstone Road) - approximately 44 homes; The Town Council does not agree to the closure of the Fire Station, as it is understood that this is a specialised unit regarding water rescue, and is the only one of its kind in a large radius, as well as being in close proximity to the M25 motorway for responding to traffic accidents. We do, however, acknowledge that if the Station does close then a small development on this site was acceptable iv) SR-0381 (Darby Drive car park) - approximately 17 homes This location is adjacent to the Abbey Gardens, part of which is a scheduled ancient monument, with many listed features including the walls. The car park spaces would need to be replaced with under-croft parking, thus raising the height of any development to an unacceptable level. The increase in height would harm the views from Abbey Gardens and so have an adverse effect on one of our major assets. The wall that backs onto the car-park is also protected as part of the Abbey grounds. Therefore this site is totally unacceptable. v) SR-0385 (Ninefields, land at Hillhouse) - approximately 60 homes; It was noted that this site, being part of the Hillhouse Masterplan, was already 'in process'. vi) SR-0541 (Waltham Abbey Community Centre, Saxon Way) - approximately 53 homes Whilst it is acknowledged that this could be a suitable site, an appropriate replacement community facility would need to be part of any such development. The provision of alternative community facilities must be completed before the existing provision is closed, i.e. there must be a contingency plan for continuous use. vii) SR-0903 (Waltham Abbey Swimming Pool, Roundhills) - approximately 27 homes. On the assumption that the Hillhouse Masterplan comes to fruition then, this is a suitable site. We would also like to draw to your attention that we believe the site is part of King George V playing fields which is a registered charity with the Charity Commission, so may require special permissions/covenants to develop. i) GRT\_N\_07\* (Lea Valley Nursery, Crooked Mile) - 5 pitches The Town Council does not agree this site for several reasons including: it adjoins the car park of a public house; it is too visible; and we contend that it should not be part of any newly developed site. The proposed location is also too close to the centre of town which goes against the wishes expressed by the Gypsy & Traveller community during the last consultation. ii) SR-0104 (land to the north of Parklands [the road]) - approximately 132

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homes; It was agreed that provided this site had its own access from Parklands [the road] and was not dependent on SR-0099 being completed, then the Town Council felt that this is an acceptable site. iii) SR-0099\* (Lea Valley Nursery, Crooked Mile) - approximately 463 homes; The Town Council felt this site was too large to go ahead as it stands, as it goes against the Town Councils view of small developments, and that it would be more acceptable if this allocation was reduced by approximately 50% on the southern area adjacent and accessing to and from Parklands. We would suggest that no more than 250 units should be designated for this site. It is understood that there may be a natural boundary that could be used to bisect the site. The Town Council has identified an area not currently allocated which is positioned just south of Beechfield Walk between EMP-0021 & SR-0061B. This area has been taken out of the Green Belt with the proposed boundary revision, but has not been allocated any form of designation, within this current draft plan. The Town Council's proposal is to site the remaining 234 units in this location. Access can be made from the roundabout to the south of the site. We understand that the LVRPA sites just north of Marle Gardens along the Crooked Mile had not been included to prevent 'ribbon' development. The Town Council's preference for smaller sites

to be progressed first meant that we would like to see these sites included: •Site SR-0901 Langley Nursery, Crooked Mile •Site SR-0902 Mile Nursery, Crooked Mile

Chipping Ongar (Draft Policy P 4)

**No opinion**

Please provide reasons for your view on Chipping Ongar:

Buckhurst Hill (Draft Policy P 5)

**No opinion**

Please provide reasons for your view on Buckhurst Hill:

North Weald Bassett (Draft Policy P 6)

**No opinion**

Please provide reasons for your view on North Weald Bassett:

Chigwell (Draft Policy P 7)

**No opinion**

Please provide reasons for your view on North Weald Bassett:

Theydon Bois (Draft Policy P 8)

**No opinion**

Please provide reasons for your view on Theydon Bois:

Roydon (Draft Policy P 9)

**No opinion**

Please provide reasons for your view on Roydon:

Nazeing (Draft Policy P 10)

**No opinion**

Please provide reasons for your view on Nazeing:

Thornwood (Draft Policy P 11)

**No opinion**

Please provide reasons for your view on Thornwood:

Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sewardstonbury, Sheering, Stapleford Abbots (Draft Policy P 12)

**No opinion**

Please provide reasons for your view on Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sewardstonbury, Sheering, Stapleford Abbots:

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7. Do you agree with the approach to infrastructure provision being proposed in the plan?

**Disagree**

Please explain your choice in Question 7:

**This is impossible to answer with any degree of certainty, without sight of the conclusions to be drawn from the analysis work still to be undertaken. How it is hoped to get any meaningful feedback at this juncture is**

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unclear. It is essential that before any decisions are made regarding development of any kind, policies are put in place for infrastructure and essential services. Concerns were also raised regarding Draft Policy D2 Essential Facilities and Services B sub para ii) Development proposals which adversely affect essential facilities and services will be permitted to do so if it is no longer practical, desirable or viable to retain them. This gives the opportunity for essential services to be stopped because they can no longer be afforded. Does this mean that in certain areas there may be no essential services as they cost money? This cannot be right.

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8. An Interim Sustainability Appraisal has been commissioned to support the Draft Local Plan. We would welcome any comments you may have on this.
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9. Do you wish to comment on any other policies in the Draft Local Plan?

Draft Policy D4 "Community, Leisure and Cultural Facilities"

Draft Policy D4 "Community, Leisure and Cultural Facilities" Draft Policy D5 "Green Infrastructure" Draft Policy D6 "Designated and undesignated open spaces" Waltham Abbey Town Council felt that one or more of these policies should include measures to protect existing allotments and cemeteries as well as make provisions for additional allotments and cemeteries. It is noted that there is no mention of cemeteries within the document. A number of town and parish councils operate cemeteries which may need expanding in the near future which should also be taken into account in the document. •We believe that space for allotments can be found in SR-0099 and/or the site just south of Beechfield Walk between EMP-0021 & SR-0061B

Draft Policy E1 "Employment Sites"

Draft Policy E1 "Employment Sites" Draft Policy E4 "The Visitor Economy" Draft Policy D4 "Community, Leisure and Cultural Facilities" Waltham Abbey Town Council would like to see stronger policies supporting the Visitor Economy and Tourism. As Waltham Abbey has considerable history and heritage, access to green Tourism, and the White Water Centre, we believe that there is the opportunity to encourage more visitors. It is also understood that there is insufficient visitor accommodation in the area, so we think Waltham Abbey needs a mid-range Hotel in the town. This would also contribute to the employment opportunities within the town. We would suggest Site: SR-0099 for location, as this is away from the current provision.

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