

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

Stakeholder ID 2610 Name Joan Desmond

Method Survey

Date

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Survey Response:

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

Strongly disagree

Please explain your choice in Question 1:

I strongly disagree with "The vision" as it is proposed as it encroaches on the Green Belt - London's green lung - which plays a critical role in preventing urban sprawl from London. Instead such proposed development would help to create an unbroken urban corridor stretching outwards from London. The draft local plan which has ambushed the Epping Forest District public with its size, location and distribution of new housing across the district significantly fails to protect the Green Belt and expressly results in the loss of explicit Green Belt boundaries. Furthermore, the draft Local Plan poses a clear threat to the historic rural settlement of Theydon Bois.

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

Strongly disagree

Please explain your choice in Question 2:

I strongly disagree. No details have been provided by EFDC as to why exceptional circumstances exist to justify removing the land highlighted in the draft Local Plan from the Green Belt. No detailed reasons have been provided as to why 360 new homes are required in Theydon Bois for example other than there is an EDFC policy to create a town instead of a village for this area without any infrastructure in place to support this new town. All the settlements in the district have been swamped by new housing proposals which should instead focus on the towns in the district which benefit from existing infrastructure which can better cope with increased capacity. Furthermore, there is also no clear evidence produced by EDFC which supports sustainable development with regard to protecting the Green Belt boundaries generally and EDFC's position flies in the face of the Government's position on protecting the Green Belt.

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

Strongly disagree

Please explain your choice in Question 3:

I strongly disagree. It is certainly better to focus development on towns, however EDFC's approach completely ignores brownfield land which could be regenerated, without the need to encroach on protected Green Belt land.

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

Epping?

No

Buckhurst Hill?

No

Loughton Broadway?

No

Chipping Ongar?

No

Loughton High Road?

No

Waltham Abbey?

No

Please explain your choice in Question 4:

The primary shopping areas in the draft Local Plan should ensure that they do not undermine existing local facilities especially those located within the smaller settlements within the Epping Forest District. In any event, the approach in the Local Plan does not support the primary shopping areas as both employment and housing development is scattered throughout all the settlements and does not focus on the towns which could support increases in primary shopping areas.

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

Strongly disagree

Please explain your choice in Question 5:

Fresh employment development should focus on the larger allocated sites and within reach of those areas capable of expanding in a sustainable manner. In particular, EDFC's proposals outlined in the draft Local Plan take no account of the adverse impacts on transport links, infrastructure and employment opportunities of increased development on Green Belt sites. There would be a significant increase in traffic in the already severely congested road networks including both M25 as well as local roads. Additional traffic would worsen

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air quality, eroding the Green Belt protection even more and affect the health of all current and future residents of Epping Forest District.

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 opinion

Please provide reasons for your view on Waltham Abbey:

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

Please provide reasons for your view on Theydon Bois:

I strongly disagree with the EDFC's proposals for development in the draft Local Plan for Theydon Bois. Four of the sites proposed for development are on the Green Belt which will suffer irreversible and irrecoverable harm if they are allocated for housing. As well as encroachment into the Green Belt countryside, the proposed developments would completely destroy the rural character and setting of Theydon Bois village and create a town instead. EDFC is proposing to increase the size of Theydon Bois village by 23% by building 360 new homes in and around the village which is a clearly disproportionate allocation of housing in such a small settlement. Present and future infrastructure cannot support this significant increase in the amount of growth. Most frustratingly EDFC have accepted without question the proposed sites for Theydon Bois on the basis merely that they were put forward by the landowners. This situation is the opposite of how a responsible and reasonable proposal for sustainable development strategy should work. Furthermore, it is not at any time the way an effective sustainable development strategy should be put in place. Theydon Bois' Village Design

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Statement (VDS) notes that "Theydon Bois is seen as a very special place by its residents and can be defined by its location as a forest village entirely surrounded by green space. The village and its landscape are highly valued and greatly admired and it is essential that all future development be handled very sensitively." The VDS states also that "the District Council have added the VDS to the evidence base for the new Local Plan" but that is clearly not the case from sites proposed in the draft Local Plan. No exceptional circumstances have been provided to justify removing the sites proposed in Theydon Bois from the Green Belt. The National Planning Policy Framework (2012) states at para 85 that "when defining boundaries, local planning authorities should [among other things]... define boundaries clearly using physical features that are readily recognisable and likely to be permanent." The railway line is one such boundary long established which has been clearly ignored in the draft Local Plan which instead proposes to build the majority of the proposed housing on the Abridge side of the railway line clearly in breach of the NPPF and the Green Belt Boundary for Theydon Bois village. If this Green Belt Boundary is breached not only the proposed development of the sites will be the inevitable result but future additional development all the way down to Abridge. A new even larger town will be created as a result. The proposed developments would, among other things, have a harmful impact on transport, local roads and road safety. The Central Line is already running at capacity at peak times with an unbroken stream of commuters accessing the Central line at Epping at these times for example. Even if extra trains were added to the Central Line network the system can only take a small increase in extra trains before safety limits for the amount of trains running on the line are inevitably breached. There are all too frequent problems on the Central line, eg, signal failures, track failures, persons on the track, persons taken ill on the trains due to the already overcrowded service, leaves on the line which cause traction problems (look at the severe delays on the Piccadilly line recently caused by this problem) and a host of other reasons why currently the Central line consistently and frequently does not provide a good service to the residents of Epping Forest District. In fact, frequent delays and disruptions are the norm on the Central line. No additional money is being provided to TfL to support an increased service to meet extra demand from extra development. Instead, budgets are invariably being cut. The extra capacity resulting from extra homes will only increase the service disruption and delays on the Central Line. There are also limited sidings on the Central line for any extra trains to go while waiting to be in service. TfL can barely cope now with operating an efficient and smooth running service on the Central Line. It certainly won't cope at all if capacity is increased on the Central line from the proposed developments which takes no account of the elderly and disabled accessing the Central Line at Theydon Bois where all the Westbound services are accessed via a bridge with stairs either side. The result of an additional 360 homes in Theydon Bois would be an estimated 720 additional cars accessing the homes on the sites. To service the developments this would also include other vehicles, like HGVs, and heavy machinery on an already busy and at times chaotic road network. The increased traffic would inevitably cause increased congestion and danger on the narrow rural roads surrounding the village. Any proposed extra facilities like schooling, doctors surgeries and shops would add additional congestion. Theydon Bois could not cope with the additional traffic and car parking involved and would experience a significant increase in stationary/idling traffic at peak times and at junctions. Furthermore, the increased traffic would increase the danger to cyclists and pedestrians (including those cyclist increasingly using local roads for recreational purposes). The issue of air quality from the proposed development is also not being taken seriously by EFDC. The Green Belt enriches the air quality for the residents of the area. Air pollution in London is at critical levels and in many instances already exceeds EU-permitted levels. Theydon Bois is located very close to the London boundary. Additional traffic which would invariably result from increased housing/shops etc would significantly worsen air quality and inevitably affect the health of all current and future residents as well as visitors to the area. The proposed development for Theydon Bois also ignores the natural environment of the area. The area is surrounded by Epping Forest which is a haven for wildlife including deer. The introduction of increased development on the proposed sites would inevitably mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, including cats and dogs in particular, that can have a devastating effect on wildlife. The draft Local Plan also ignores how the proposed sites will deal with natural features like the Genesis Slade which flows east through Theydon Bois Village and discharges itself in the River Roding near Theydon Garnon/Abridge. The proposed sites at Theydon Bois underground and the Old Foresters site would be particularly affected by Genesis Slade. The land in these areas have in the past been flooded. The development of these areas would only increase the risk of this

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problem occurring in the future and without any measure of compensation being offered to existing residents of Theydon Bois should their properties be flooded as a result of the development of the sites. The draft local plan also ignores how issues of subsidence will be dealt with by building underground and adjacent to a railway and how residents will be compensated should damage to their properties occur as a result of the proposed development of the sites.

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:

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

Strongly disagree

Please explain your choice in Question 7:

No. I strongly disagree. The draft Local Plan is scant on detail as to what the approach to infrastructure provision will be. Generalised statements about infrastructure requirements lack quality of focus and are impossible to quantify at best. Concrete infrastructure proposals to support the proposed development sites are glaringly absent from the draft Local Plan. Nor are detailed proposals to ensure the infrastructure will be operationally in place in time to meet the needs of any development.

8. An Interim Sustainability Appraisal has been commissioned to support the Draft Local Plan. We would welcome any comments you may have on this.

The Interim Sustainability Appraisal does not satisfy the needs of the wide dispersal of development proposed in and around the villages of the Epping Forest District. Existing transport links for Theydon Bois rely on an infrequent and limited single decker bus service. Extra commuter traffic to London resulting from the proposed developments would be impossible on the existing and proposed ISA. The Central Line service from Theydon Bois village is at capacity during peak times, there are frequently and repeatedly problems with the service including missing trains which are pulled from the service without notice or explanation. New development will only add to increased use of Theydon Bois Central Line station increasing congestion on the already overcrowded trains, as well as increasing traffic congestion to/from the station as well as parking problems for commuters. Increasing Theydon Bois by 23% in size will result in a large increase in the

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population of the village who will mainly have to rely on the larger settlements for a wider range of facilities. This will inevitably lead to increased car journeys, congestion, increased air pollution and increasing damage to already damaged roads. The ISA inevitably takes away land from the Green Belt which is particularly evident in Theydon Bois and does not protect this high value area from development at all. Instead the draft Local Plan proposes encroaching on the Green Belt while driving a coach and horses through clear and defensible Green Belt boundaries like the railway line at Theydon Bois. These boundaries as well the Green Belt instead should be maintained and protected instead of used for development.

9. Do you wish to comment on any other policies in the Draft Local Plan?

Detail on the EDFC's policies in the draft Local Plan are lacking. In particular there are no detailed Green Belt policies to define what are disproportionate extensions to existing properties in the Green Belt or what 'materially larger' actually means. The infrastructure approach is also wholly and lacking detail. What additional parking measures are needed to meet the proposed development are also absent.
