

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

Stakeholder ID	4419	Name	J Gillespie
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Letter or Email Response:

Dear Sir or Madam, Please find herewith my responses to your consultation, for which a series of multiple choice questions is wholly inadequate. 1. Do you agree with the overall vision that the Draft Local Plan sets out for Epping Forest District? The overall vision sounds nice but it is let down by the rest of the document. 2. Do you agree with our approach to the distribution of new housing across Epping Forest District? No. The proposed changes to the Green Belt appear to have been driven by the wishes of developers rather than the needs of the populace. Central Government and Epping Forest policies both state that local planning authorities should take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This draft local plan completely ignores those policies, seeking to spread development all around the District, regardless of anything else. This is wrong and none of the evidence produced by EFDC supports this new approach to development. Nor is it in line with current Central Government thinking. 3. Do you agree with the proposals for development around Harlow? Harlow seems to be open to the development, but any incursion into the Green Belt is not welcome. 4. For the two town centres and four district centres in the District the Draft Local Plan sets out a proposed primary shopping area which is intended to protect and encourage retail uses (See Draft Policy E 2 and Section 5 - Places). Do you agree with the proposed shopping areas? Primary Shopping Areas should encourage retail development in these locations, but this should not be at the expense of the local shops in the smaller settlements of the District. The local plan should support Primary Shopping Areas by placing more housing and employment development around these areas. This will help protect and encourage retail uses and shopping businesses in these new areas, and give the existing small businesses a chance. 5. Do you agree with the proposals for new employment development? No. New employment development should be focussed on the towns and settlements which are keen to expand in a sustainable manner. Employment sites should not be left to be allocated "as appropriate" because the Green Belt constraints will limit the effectiveness of this with the likely result being that only the allocated housing sites will come forward. 6. Do you agree with the proposed sites in your area? No. My area is Theydon Bois, around which four of the sites are in the Green Belt and these parts of the Green Belt have been identified as having a high or very high level of harm if allocated for housing. They are either located within the 'village envelope' or have clearly definable boundaries that should not be breached. This harm will result in encroachment into the countryside and a loss of the fundamental openness to these areas. There is no explanation of the need for 360 new houses in and around Theydon Bois, an increase in the size of the village of around 20%. How has such a huge expansion "been informed by the aspiration for Theydon Bois to maintain its local feel and character" (paragraph 5.139)? To add insult to injury most of the proposed development sites are on Green Belt land, which the council intends to fudge around by changing the Green Belt boundaries, in complete contradiction of the spirit of protecting the Green Belt. The local plan does not contain any very special circumstances that clearly

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outweigh this harm, and therefore the Green Belt boundaries should not be altered as part of this local plan. It is also clear that the sites are only in the local plan because they have been made available by landowners, rather than being part of a clear and effective sustainable development strategy. 7. Do you agree with the approach to infrastructure provision being proposed in the plan? As far as I can see the Draft Local Plan does not really address infrastructure provision, but after recognising concerns it defers details to the Infrastructure Delivery Plan and Infrastructure Delivery Schedule. 8. Also 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 support the spreading of development in and around the villages of the District. People will still need to visit the larger towns to gain access to the full range of services, and without vast improvements to the bus services this will mean more cars on the road leading to more congestion and more pollution. For Theydon Bois, the Sustainability Appraisal says that the basis of assessing sites in the Green Belt was "to enable sufficient sites to be considered to maximise existing sustainable transport links within the settlement". The transport links are already at capacity and the underground station is poorly served by the existing road network and bus services, such that any new development designed and located to use the station will further add to the congestion and over-crowding already experienced around the station and on the trains. The Sustainability Appraisal states the approach to the Green Belt sites will protect the most high value sites from development. The document then contradicts itself by stating that high quality Green Belt land will be lost. 9. Do you wish to comment on any other policies in the Draft Local Plan? The Theydon Bois Village Design Statement was supposed to be part of the evidence base for the new local plan so why is there no reference to it? Paragraph 3.94: "In these locations there is a case for reviewing whether it is appropriate for these developed areas to remain within the Green Belt, or if a more defensible boundary would be appropriate in the long term." Unless we're expecting a military invasion what makes one boundary more defensible than another? Boundaries are lines on a map and I expect the Council to defend the boundaries of the Green Belt by refusing permission for inappropriate development. This and other parts of the Draft Local Plan give me the impression that the Council is attempting to pay lip service to their duty to protect the Green Belt, while at the same time "moving the goalposts" almost literally by redrawing the boundary of the Green Belt to suit developers. I notice that all of the "proposed Green Belt boundary alterations" make the Green Belt smaller, not larger. Paragraph 4.76 "In 2008 road transport related co2 emissions produced per person 4.77 per annum in Epping Forest was 1.66 tonnes." What does this mean? 4.77 what? There are too many other sections to respond to them all given such a short space of time for this consultation. Yours Faithfully, Mr J Gillespie

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