

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

Stakeholder ID	3097	Name	Andrew	Smith
Method	Letter			
Date	4/2/2017			

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### Letter or Email Response:

EFDC Draft Plan Consultation 2016 12 December 2016 I enclose a response on behalf of The Epping Society to the EFDC public consultation for the Draft Local Plan. Our response is in a long form in order to make our views clear on a number of aspects of the draft plan, and the consultation process, which we found we could not fit within the limited list of questions for which you invited online comments. We would like to record our thanks for the time which certain Councillors made available to us. From this we felt we were able to get a better understanding of the procedures already followed and those yet to come. Naturally we took the opportunity to enquire about those Councillors' views and we made our own general position clear to them. Our high level view of the draft plan is as follows, but more detail can be found within the full response we enclose: 1. The Epping Society strongly supports the Green Belt and nothing in our response should be taken to represent any acceptance of the proposals to build on it or reclassify parts of it for development. While we accept that periodic reviews of the extent and exact boundaries might be appropriate, we recognise that the recent exercise was not undertaken as an objective review but instead it was driven by the perceived need to create additional building sites in the district. 2. The Green Belt has served the people of London and the districts around London very well. Its stated purpose has been achieved and it represents one of the more successful long term environmental policies in Britain. This has been a result of support across the political and social spectrum and by means of its permanence. We are alarmed by an apparent casual approach to changing its boundaries for reasons of expediency and we fear the loss of permanence will destroy the principal means for the defence of the Green Belt which will be a loss to ours and to future generations. 3. We do not believe the draft plan is fit for consultation. None of the principal infrastructure requirements have been identified in quantitative terms nor has the location, funding or timing of any additional provision been specified within the draft plan. While we recognise that agencies other than EFDC are responsible for providing most of these missing (and according to our members, already inadequate) infrastructure services, it was the duty of the planning authority to identify these requirements and ascertain delivery arrangements from those agencies. That has not been done and Registered charity number 263649 accordingly the plan is not sustainable. The draft plan has not been developed in an holistic manner, which seems to us to be the essence of any planning process. 4. We have not been able to identify an objective decision process whereby prospective sites (as analysed, for example, by ARUP) and the reported capacity of them for housing has been reflected in the draft plan. Certain sites with a preponderance of negative scores on the ARUP report have nevertheless been included for development. In one cases the number of dwellings proposed is significantly different from the potential identified by ARUP and the reason is not clear. We are anxious that the larger numbers will be built even though that has not been consulted upon. 5. In the course of the EFDC debate on 18 October 2016 and in subsequent conversations with Councillors, we have understood that changes may be made to the draft plan. As the

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draft plan implies that the target number of dwellings for the district is fixed or substantially fixed any removal of sites or significant reduction in the numbers of dwellings must result in additional numbers elsewhere or new sites not consulted upon. The location of infrastructure requirements and employment sites are not generally identified. Accordingly we consider that further public consultation should be undertaken on any material changes and any additional depredations on the Green Belt which emerge from a study of public responses to this consultation and any input from the Planning Inspectorate. Such an arrangement would ensure transparency which many of the public feel is lacking. 6. While the demographic analysis on which the draft plan was based shows a growing "need" for single person homes and homes suitable for older people, we found no data on the intended location of any particular housing types across the district. We feel this is a shortcoming. 7. We do not believe that sufficient focus has been put on identifying opportunities to increase the density of existing communities nor has there been sufficient attention to the density of proposed new development sites. We note recent reports that new development in Britain is often at levels materially below existing density (which we consider would cause a needless and unjustified loss of open space) and we were not able to find information in the draft plan to show the densities for the main communities in the district, against which to compare these proposals. The overall objective of The Epping Society is to conserve and improve, which are almost entirely related to the future of our area. In support of our objectives we have arranged two public meetings this year which were over-subscribed. Feedback we have had suggests we have been a principal vector in bringing the draft local plan to the attention of the public. In these meetings we stressed the need for a high standard of planning and architecture in the district, which is another of our objectives. We regret to report that our Committee and our members are not satisfied with the draft local plan even within the limitations adopted by EFDC and we do not believe it meets the requirements of the National Planning Policy Framework. \* Appendices - 00796\*

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