

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

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Method	Letter			
Date	27/11/2016			

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Letter or Email Response:

Dear Sirs, Re Draft Local Plan (DLP) I am registering my views and objections to the plan in relation to proposed developments in Loughton and in particular on Jessel Green, Rochford Green, Luctons field and the car parks at Loughton and Debden stations. I am also concerned with the impact on the whole district. This is a lengthy response but as I have had to find my way through over a thousand pages of the DLP, Draft Infrastructure Delivery Plan (DIDP), Report on site selection, various appendices and associated documents I trust you will do me the courtesy of reading it all and noting my concerns. Population Density The attached map taken from EFDC Shaping the future website, shows the area with the highest population density in the district is Loughton. This key issue gives rise to virtually all the other points. Infrastructure and Transport Local roads are crowded at best. Chigwell Lane, Rectory lane, The Broadway, Loughton High Road, Station Road, Roding Road, Oakwood Hill, Lower Alderton Hill and even Willingale Road at school opening and closing are frequently at a standstill. The slightest incident at busy times, albeit a breakdown, accident or buses not been able to turn and the ripple effect jams peripheral areas as drivers seek alternative routes and it becomes static. Increased population and development of the area and especially Station car parks in Debden and Loughton will compound the problem. The Council fails spectacularly to maintain existing roads through the Debden estate and puts temporary patches on the worst potholes each Winter. Repairs usually fail quickly and defects reappear. Increased population and traffic will be detrimental. Additional traffic through Debden and removal of the 167 bus service increases road safety risks to children attending the many local schools and will worsen due to extra traffic from people driving children to school due to inadequacy of the proposed school bus service. There is negligible room in Loughton for widening or improving roads. The work ongoing in Chigwell Lane will make minimal difference at busy times. The M1 is at a crawl back to junction 5 most the mornings. The tailbacks on the slip road off of junction 5 in the evenings are a disaster waiting to happen. It is only a matter of time until there is a major incident. Everybody recognises it except the people in a position to do something about it. All main roads out of Loughton through to Chigwell, Buckhurst Hill and Woodford are congested in rush hours. The unwanted development of the retail park in Langston Road will add to the mess. Page 17 of the DIDP notes: "Congestion around Loughton is exacerbated by the fact that Junction 5 of the M1 has no northbound slip road, which subsequently draws traffic into the surrounding areas to access the motorway." What nonsense. The truth is that if there was a Northbound slip there would be more traffic through Loughton and it would be worse. On Page 186 of the plan it states: "C. Proposals for development should clearly demonstrate that infrastructure can be provided and phased to support the requirements of proposed development." Although the DLP is quite specific about proposed development areas, it is woefully lacking in specific infrastructure to match. On page 16 of the Draft Infrastructure Plan (DIOP) it states: "Essex County Council maintains an extensive infrastructure network, however there is limited available funding for major new infrastructure

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investments. Significant levels of growth are planned for the District, which will place increasing pressure on existing transport services and create increased demand for new infrastructure." There will be minimal new infrastructure. There are vague references to proposed improvements at junction 7 on the M11 by 2020 which will only enable drivers to get to the congestion at junction 5 a bit quicker. The wider road network runs with minimal slack in the system. Major incidents within about 10 miles on the A406, M11, M25 and A13 have a major effect on the area. Due to the lack of a major river crossing between Dartford and Blackwall closures of the Dartford Crossing throw the whole area into chaos as drivers seek alternative routes. On page 125 of the DLP it states that Loughton has over 20 different bus services. Wrong. This information comes from page 45 on Site selection appendix C yet it only lists 12 routes and I know of no others. One of these, the 167, is earmarked for closure between Loughton and Debden. Many of the others have limited, intermittent services and do not run 7 days a week. The suspension of the 167 through to Debden, due to funding, is a real blow to the community. If there is a funding problem it should have been cut between Gants Hill and Ilford which has numerous routes. Increased population will put more pressure on the 20 service and any other service that may be introduced. Already I frequently see buses, at school starting and leaving times, completely full and leaving people at stops. There are three major secondary schools in the area and all have pupils using the 20 and 167. From Appendix C of site selection it says "Bus routes along Loughton High Road are also in need of improvement." EFDC are withdrawing funding for the 167 so it will be worse not better. On page C36 it further notes: "A lack of car parking provision across Loughton. Traffic congestion has also been identified as impediment to existing retail centres and local businesses. Significant transport congestion issues in parts of Loughton have been noted, specifically Loughton High Road, Langston Road, Rectory Lane and Chigwell Lane at peak travel times. Station parking is also insufficient, which has implications for residential areas." Yet EFDC want to build on both Loughton and Debden car parks. If they are inadequate now and you have buildings on top with new new homes, where will the new residents park? There has to be less room whatever is done. The tube service from Debden and Loughton is reliable and regular but in rush hours is invariably standing room only. Further down the line it is uncomfortably crowded and increasing the population in EFD will make it worse. If plans to develop parts of Harlow are thrown into the mix it is certain that some people will be driving to Epping to use the Central line as well. Beyond Leytonstone the frequency of trains is doubled and they are still packed. There is no room for extra capacity during rush hours but the EFDC DIDP advises on page 24 that TFL expect to increase it by 25% on the Central line by 2025. According to page 23, TFL run 34 trains per hour through the core section of the line. Increasing this to over 40 is ridiculous, there would be insufficient time to get people on and off. It will not work. The DLP does not mention any concern for the effect of increased congestion further into London. Appendix C page C45 notes: "Concerns generally have been raised about the capacity of the Central Line to cater for existing population, and this could act as a constraint to any future development associated with the line. (Source: Settlement Hierarchy Technical Paper, 2015)." Related to transport in general Page 21 advises: "Funding sources will be considered further once the future highways infrastructure requirements are better known. Limited opportunities for funding major infrastructure will mean that additional growth in the District will be largely accommodated by making better use of existing transport networks." What nonsense. How can you make better use of a network that is at capacity plus now? Page 3 of the DIOP states: "The Local Plan should make clear, for at least the first five years, what infrastructure is required, who is going to fund and provide it, and how it relates to the anticipated rate and phasing of development." The DLP is lacking in any detail of infrastructure although proposed developments are in detail. It is vague and seems to take the view that infrastructure will follow development. I note that in relation to funding, the phrase "developer contributions" appears 12 times in the DIDP but is frequently qualified by such terms as "could", "maybe", "possible", "likely" etc. Unfortunately unlike the potential housing proposal, nothing concrete. On page 20 of the DIDP it goes on to say: "Accessibility work undertaken as part of Local Plan preparation in 2014 assessed proposed housing sites in relation to the public transport network (road and rail), and their proximity to local services including schools and GP surgeries. This work has enabled sustainable locations to be prioritised in subsequent site selection work. The findings concluded that Loughton contained the largest number of sites with a high level of sustainability access." This finding does not consider the counter proposal that it will also cause the highest level of congestion, worry, stress on services and loss of amenity to the existing residents and will increase what is already the highest level of population density in the district. In all aspects the suggestion is a bit like moving everyone closer to a bus stop or a Doctor so they have access to a service regardless of whether it can cope with demand. Effectively there is no Infrastructure plan. It is vague and nonsensical, it says improvements to the bus service in Loughton are required but EFDC are cutting funding for the 167 which is one of the two main services between Loughton and the Debden estate. It has undeliverable ideas about the Tube capacity. There are no major road improvements because there is no where

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to do it. The LDP is frequently at odds with itself and as an example from page 77: "In addition land may also be needed for improvements to train, bus, cycling and walking networks, to improve connectivity and/or capacity. It is important the Council ensures that the implementation of such schemes is not prevented as a result of permitting development which would prevent such routes." How does that square with the selection of the car parks at both Laughton and Debden stations as potential development sites which will make things worse? Local Services Services at local Doctors surgeries are already stretched. It is almost impossible to see a Doctor in a sensible and reasonable time for a non urgent matter. I recently tried three surgeries in Laughton to get an early appointment for a health concern. The response was much the same, poor. Eventually I paid for a private consultation but not everyone can afford it. The nearest A&E hospitals are Whipps Cross and Harlow. There is an Ambulance station in Rectory Lane, cleverly placed on one of the most congested roads in Laughton. It is quite normal to see Ambulances with lights and sirens on trying to negotiate the traffic. In the last month it has been necessary for an air Ambulance to land on Jessel Green to deal with emergencies. There is a pressing need for a Minor Injuries Unit in the area but none is mentioned in the plan. On page 69 of the DIDP it states : "Initial consultation highlights that there is an overall capacity deficit within the surgeries serving Epping Forest District, particularly as branch surgeries do not provide additional capacity . Surgeries in the District are facing rising patient demand, particularly from an ageing population with complex health needs." EFDC is not delivering the service to the existing population. I do not believe they will provide it for the increased number of people that new development may bring. I do not have school age children but understand from friends and neighbours that school placement within the area is already an issue. The DIOP in section 6.1.3 acknowledges that childcare provision is already under pressure and likely to worsen without taking into account growth of population from potential development. Well Being This cannot be quantified but green spaces are so important in giving residents a psychological and physical breathing space for recreation and aesthetic relief in a densely built up area. Rochford Green and to a greater extent Jessel Green are greatly used for children to play, for picnics, by dog walkers, people exercising and for organized events. The greens particularly benefit occupiers of the many flats, maisonettes without a garden and houses with small gardens. The greens are accessible to all and good for younger children whose parents consider them a safe area close to home and for older residents who want to walk close by. Epping Forest is near but it's unsuitable for unsupervised children and is not so accessible for disabled or elderly residents. My wife and I frequently walk over Jessel Green on route to eat out in Loughton in the evenings. We always stop at the top to take in the 360 degree view, comparing the aspect of London to the contrast of the Essex countryside and Epping Forest. This is a cherished place and a wonderful hill to get children to climb and see the wider world beyond Loughton. There are few places anywhere near London where they would have this opportunity. Green Space and Green belt The DLP expounds the Council's commitment to Green policies which may be summarised by this extract from page 53: "The Council will protect the natural environment, enhance its quality and extend access to it; this contributes to the health and wellbeing of its people and economic viability of the District. In considering proposals for development the Council aims to create a comprehensive network of green corridors and places, appropriate to the specific rural or urban setting. In so doing, it seeks to connect and enrich biodiversity through habitat improvement and protection at all scales, and extend access to and maximise the recreation opportunities of, our countryside and urban open spaces " The choice of Jessel Green, Rochford Green and Luctons Field as potential development sites are contrary to this policy. The development of green spaces within Loughton as mentioned in the DLP is also at odds with evidence from other council documents/reports quoted as follows: Report to the Local Development Framework Cabinet Committee Report reference: LDF-015-2010/11 Date of meeting: 7 February 2011 Page 13. Section 5 "The SA (Sustainability Appraisal) will ensure that the Council continues to protect maintain and improve upon the high standards of Green Spaces within the District whilst tackling the issues which can lead to their degradation and render them unsafe to use. Page 13. Section 7. "Other significant issues raised from the consultation process were: the importance of the maintaining a network of urban green spaces, particularly around the Debden Estate and separating Buckhurst Hill from Loughton". Page 28. "The key findings of the community visioning were as follows: a.Priorities for the District over the next twenty years: To protect and enhance Green spaces whilst encouraging the growth of local jobs and businesses b.Most important planning issues facing local areas: Better protection for green spaces, reducing traffic congestion and providing more local job opportunities. An announcement made on the EFDC website suggested that they had no plans to build on green belt land. I notice several documents and plans reference proposed amendments to green belt boundaries . I do not understand that. The implication is that if they move a piece of land out of the green belt it is in order to build on it which makes little sense to me. For example page 32 of the Report on Site Selection advises "In order to support the proposed site allocations alterations will be required to the District's Green Belt boundary".

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Alternative sites I do not see why or how EFDC expects residents to make suggestions. Residents do not know who owns what and if restrictions or covenants of usage may be in place. It can create Nimbyism and put groups of residents in opposition. I reject the inference that if residents do not find alternative sites proposals will stand. That is intolerable and an abject abrogation of responsibility by EFDC. There is insufficient space to build without causing detriment to the existing community. The proposition is an imposition and EFDC must consider no further large scale development in Laughton. The idea that a quota has been set in stone for the area and must be accepted is not acceptable. The community has been told it is their plan and the Council should be planning what the people want, not vice versa. The Langston Road Council site should have been used for housing and still could be. Not a retail park, that no one asked for or needs, and renting it out for Council benefit. It will take business from existing local outlets and make the existing congestion worse. However, you have asked for alternative sites so I suggest Copped Hall Estate, Laughton golf course, Epping golf course, Theydon Bois golf course, Abridge golf course, Top golf Chigwell, Stapleford airfield. Large spaces used by relatively few people instead of taking the relatively small spaces of Luctons field, Jessel Green and Rochford Green which are used by a lot of people. Maybe go further afield and consider the Royal Parks, Hampstead Heath, Blackheath, Wanstead flats, City of London Cemetery, Highgate cemetery and indeed any cemetery. All areas for which people would throw up their arms in horror. The point is not flippancy. I would hate to see these areas developed. It is to illustrate that Loughton residents feel equally strongly about their green spaces. Just because they are mostly in Debden which was largely built as a council estate does not diminish their value in comparison to sites in the leafier parts of the EFD and across London. It is exactly for this reason that they are even more important and necessary in the most densely populated part of the district. Before taking green space to meet housing needs EFDC and HMG should consider Land banks held by builders and empty properties. In reports in the Independent and the Guardian in December 2015 there were over 600,000 plots held by Building companies that could be developed. This was also referred to in a Channel 4 Dispatches programme on the 7th, November. In a BBC report also in December 2015 it featured figures produced by the government that there were over 600,000 empty properties of which, at that time, over 200,000 had been empty for over 6 months. Blight Areas around the greens are blighted by their inclusion for potential development. This may seriously affect plans of people wishing to move or sell up for other reasons and will be very upsetting for anyone who has just moved into the area and face the prospect of exchanging a view of a green space for more bricks. These spaces should be removed from the plan as soon as possible. Plan Validity The Councillor with Portfolio for this plan described it as "a complex and detailed document". It is 235 pages. What is not apparent, until you get into it and realise should be read in conjunction, are the 204 pages of the Draft Infrastructure Delivery Plan dated 30th, September 2016 and the several appendices, one of which is over 400 pages. Further there are the 58 pages of the Report on Site Selection and numerous appendices. There are probably others I have not discovered. Each of these documents reference other reports, documents and consultations with all manner of bodies to such an extent that it is impossible to find rationale for what the DLP proposes. It seems full of speculation and consideration for what local people want has been lost. I believe the plan was hastily concluded and residents unfairly given the minimum legally allowed consultation time for such a vast proposition. It is probably because the council is facing penalties from the DCLG for the tardiness of its completion. According a council meeting on the 15th March 2016 Subject: Local Plan Update "One of the penalties proposed for not having produced a plan, (it is not clear yet how this will be interpreted), is the loss of New Homes Bonus." According to the following a large sum of money is potentially at stake: Report to the Local Development Framework Cabinet Committee Report reference: LDF-O J 9-2010/1 1 Date of meeting: 7 February 2011 "the District Council could receive a New Homes Bonus of around £670,000 over a six-year period, for every 100 homes built within the District." That was the figure in 2011. Whatever it is now, the possible loss was a concern at the meeting on the 15th, March this year and I suggest is why the consultation time is the minimum allowed. On page 6 of the DLP it states: "Previously, you have helped us shape the emerging Plan through the Community Visioning consultation in 2010/2011 and then the Community Choices (Issues and Options) consultation in 2012." I have no recollection of this, neither does anyone else I have asked. In particularly referring to sample areas Jessel Green SR-0361 and Rochford Green SR-0358 the DIDP bears the following comment for both areas: "Community feedback: The Council did not consult on a growth location which covers or is near to this site." Under the Site Suitability Assessment for both areas under criteria 5.2 Settlement character sensitivity it also states: "Development could detract from the existing settlement character. Site is identified as a potential regeneration area. However, the whole site is an existing open space. Therefore, redevelopment has the potential to adversely affect the character of the area." I therefore question the validity of the plan for two reasons: 1. On the basis that by the EFDC's own admission consultation on certain areas did not take place. 2. The complexity of the DLP and associated documents make the

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consultation period of the minimum legally allowable time grossly unfair. It is impossible to make a fair assessment and response in the given time. Political considerations There is widespread concern about the EFDC selection of urban green spaces in Loughton, which is the most densely populated part of the district. The ruling Conservative Party do not have any seats in Loughton and have a history of ignoring local opinion about building plans. I understand that the construction of a seven storey building on the site of the Winston Churchill pub and the Langston Retail park were both challenged locally but given the go ahead by EFDC. The fear is that EFDC will ignore the views of Loughton residents again and develop the greens on the premise that they are near what overloaded infrastructure exists as alluded to earlier. Suspicion is that it is because the Conservatives have no seats or indeed votes to lose here. Character of the area Since humble beginnings as a council estate housing overspill from East London in the 1950s and 1960s, Debden has been a success story. It has developed its own character. The widely verged roads, open greens and mature trees give it a welcome spacious ambiance that is a pleasure to enter. It is a model for good planning, creating a suburban area with a rural feel. The prospect of the loss of the largest green spaces left is totally depressing. There has already been much added since it was originally built. Hemmed in by Epping Forest, the Central line, developed and protected areas, there is now nowhere to extend so EFDC are looking inwards. They want to put over spill in the overspill. For all the residents I have spoken with this is the last straw. Appendix C page C52 states: "There needs to be recognition of the communal and historic importance of the Broadway & Debden area arising from its development as a post-war town, with many residents wishing to retain its present form and unique communal spirit." It feels as though the EFDC view Debden as a painting by numbers picture that once had a green background and they will not be content until it is obliterated. National planning policy framework This framework sets out the Government's planning policies for England and how they are expected to be applied. I draw your attention to these points: 74. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: •• an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or •• the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or •• the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss. These tests only require that one of these conditions apply for building on proposed sites to be excluded. They actually fail on grounds for inclusion on all three for the following reasons: Site suitability assessments have been made for all three and none have been noted as surplus to requirements that I can see. There is no hint in the plan of replacement by "equivalent or better provision in terms of quantity and quality in a suitable location" There is no planned development on any of the sites for alternative sports or recreational provision. For clarification please refer to Site Suitability Assessments SR-0361, SR-0358 and SR-0356. Conclusion The plan is bad for the whole district and particularly for Loughton in view of existing population density and congestion. That alone should be reason enough not to shoehorn more homes into the most crowded part of EFD. Building on the greens is contrary to many of the guidelines that EFDC claim to be following. It is also in deference to the National planning policy framework. A lot is said in the plans about analysis of current infrastructure and forecasts but in spite of a requirement to "make clear, for at least the first five years, what infrastructure is required, who is going to fund and provide it", there is little detail. It is vague, frequently contradictory, speculative about funding and contrary to common sense to the point of being ludicrous in many respects. No mention of where the extra schools, health centres, road improvements, alternative green spaces will be despite there being clear intention where EFDC want to put dwellings. A lot of the information given in the LOP and associated documents about capacities, quotas, projections etc. actually make a very good case for there not being any development in the district and particularly in Loughton. On page 186 it states: "Planning permission will only be granted for developments where the infrastructure and services required to meet the needs of the new development and/or mitigate the impact of the new development is either already in place or will be provided to an agreed timescale." The infrastructure and services are not in place now, (and what is fails to covering existing requirements), and I have absolutely no faith that it will be provided. My view is that when the author wrote this section they should have thought «That's not going to happen, let's stop now." EFDC and other councils with the South East should have rejected the demand from central government at the outset of this process. The South East and particularly London within the M25 is over populated with creaking infrastructure. Everything operates with so little slack in the system from transport, health services, school provision, housing, policing and so on that the smallest problems have knock on effects. More housing is needed in Britain but regeneration in other regions should be given priority and resources to create jobs and housing. There are derelict areas of the country that could be used, ex Army bases, disused airfields, Industrial sites and dock areas that could be redeveloped to encourage settlement away from the South East. The undeveloped land banks and empty properties

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mentioned earlier should be utilised first. It is unreasonable and irresponsible to continue cramming people into the South East and specifically for this purpose, the Laughton area. More people need more jobs so more businesses are brought in. They grow and eventually more people, homes and resources are needed and so it will continue on until the South East is an intolerable and unpleasant place to live. There is minimal space within the "Loughton" end of Loughton so the few green spaces at the "Debden " end are part of the choice by EFDC. Does EFDC think that because this was originally built as a Council Estate that people are used to it and will not notice? The reason for selecting these green spaces in Loughton is because they aren't the only significant ones Left. My understanding is that both Jessel Green and Rochford Green are EFDC owned which gives rise to the suspicion that the motivation for developing this land is the money the Council will receive, completely ignoring that this area is the most densely populated part of the district. Debden is full of aspirational people who are proud to live here. Mostly they now own their homes, want to improve them and their environment and provide a good place to live for their families. Attempting to rob them of Luctons field, Jessel Green and Rochford Green and the other areas and create chaos at two Tube stations is a humiliating rebuff to those aspirations and sends out a clear message that the District Council has scant regard for it' s community. I am grateful for your attention and shall be obliged if you will acknowledge this letter and confirm its content has been noted. Yours Faithfully Mark Hickey *Attachment of population density*

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