

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

Stakeholder ID    4794                      Name                      Henry                      Stamp

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:

The draft plan gives an OAHN of 11,400 new homes and states the components of this (natural increase plus 2 types of migration). But it doesn't quantify the natural increase (in net migration) figure. The East of England Plan (EEP) considered this to be 3,000; although as EFDC community choices pointed out exact figures for this and a similar amount for around Harlow but in EF district were not given; nor were they for north of Harlow (GC - East feared a legal challenge from E.Herts, if they did). The natural increase figure will have risen since then but the District must plan for unless one is expecting the District's children to move out if i.e when they get a home of their own (even though building enough homes for them is no guarantee they will get their and incomers from wherever - might instead). So the natural increase figure needs to be accommodated within the district in whatever pattern is considered more sustainable [see also answer to Question 2]. The news of the OAHN could in theory go anywhere in the sub-region as it is promising for incomers not tied to a particular location. As the EEP identified in policy terms, the logical place for this in the core of the London Stansted Cambridge Corridor is Harlow and immediately surrounding lands in adjacent districts. And this is a reasonable alternative strategic approach missing from the plan but which could and should be followed especially give all that the draft plan says about the needs of, and opportunities at Harlow: sub-regional centre and "HMA's key urban centre" [para 3.45]; Enterprise zone, economic and social representation needs; "opportunity to capitalise on its transport corridors" [planning our future leaflet]; new junction 7A; Harlow the most sustainable option [para 3.49]; capacity for growth beyond 2033 [para 3.50]; comparative lack of constraints at east and North [para 3.61]; a good location for employment, retail and community uses as well as housing [draft policy SP3]; "transformational ground" [Para 3.77], well placed as meets the needs of a opening Stansted Airport; "(illegible) neutral" jobs growth of EF District [para 3.41/2]; and new Camden Town [para 3.5]. Also large 'chunks' of new homes gives the best opportunity of planning Transport services in a "comprehensive and cohesive approach" [policy SP3E]; and avoid creating local problems (e.g traffic congestion, school place shortages) in multiple other towns and villages. its the theory behind new settlements and new major urban extensions as a way of providing for significant but sustainable growth. Harlow District has less population than EFD but its compact nature means less use needs to be made of the

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private car (less emissions and higher (illegible) to support buses - which with bus lanes can reduce congestion and more waiting and (illegible) opportunities between places - it has an underused buses in network of (illegible) ways in the original New Town which should be extended); transport routes pre-planned [para 4.80] and a greater concentration of population to support services especially the "higher coder" services (Coop Board, Draft Mall etc) but this is draft and subject to public consultation (which is a contradiction). If the most sustainable Alternative option means a different approach should be followed in final plans, then it should be. I've seen that a local plan inspector in NE England has observed that a duty to incorporate does not mean a "duty to agree" The approach set out above succeeded at the EIP into the EEP and should do again so now.

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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:

There are Reasonable Alternatives not identified in the plan for distribution of housing and jobs in the district, whatever the final figures might be. So far as i can see, including the previous consultation these have not been considered fully and could be a lot more sustainable. Pages 74-77 of the draft plan are good or sustainable transport. A mix of the following elements might be advantageous. a)Concentrate development on Towns etc along the Epping - Ongar railway line, developer contributions to pay for new signalling to enable trains to pull into Epping Station Platforms. Even if only a peak hours commuter service is provided (e.g by EOR to generate funds for their time) b)Concentrate development in places with National Rail stations close-by e.g Roydon, Lower Sheering. c)Concentrate development where it will help get bypasses built (eg Roydon and 1 or 2 at Ongar) Such a sustainable approach/es would help the justification for Junction 7A that the plan notes will be necessary. A mix of these above approaches doesn't stop local needs being met in other settlements, whether by tailored and really needed individual site allocation or Neighbourhood Plans (set to cover a lot of the district as the plan shows) Also a mix of these approaches still leaves currently individual sites to come forward; either to provide choice to developers in the market for land or if some sites don't come forward as expected. And currently identified sites could also become safeguarded (as could further sites eg made more acceptable once the EOR resumes public services, closed by London Underground on a true premise.

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

Strongly disagree

Please explain your choice in Question 3:

For the reasons set out under Q1 I don't agree with the proposals around Harlow in broad terms. Additionally I think the site South of Harlow is too large (and it's large even the (illegible)). During preparation of the work EEP on EFDC officer assessed the capacity as only a few hundred homes. Para 3.67 recognises the importance of the "village line" which shouldn't be breached and the draft EEP work (illegible) keeping Harlow within the natural 'bowl' of the landscape. It seems that the draft plan proposals for the south might be visible on the ridge - depending partly on building heights. Plan para 3.52 identifies capacity north of Harlow to be over 3,000. However work during EEP preparation (admittedly by site promoters) identified capacity of choice 12,000 over 20 years and up to 25,000 beyond that period. Substantial growth north of Harlow should best help Harlow's image.

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

Epping?

Buckhurst Hill?

Loughton Broadway?

Chipping Ongar?

Loughton High Road?

Waltham Abbey?

Please explain your choice in Question 4:

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

Strongly disagree

Please explain your choice in Question 5:

The allocation of job sites, jobs in different sectors and floor-space/site need, locations of current areas of deficit and new housing allocations is a major omission from the plan. It maybe that job locations need (illegible) on sites currently identified for housing e.g SR 0587 and 0556 - see Q6 re-Epping. I object to para 3.59 as aspirations for higher levels of jobs in the district is not consistent with the best protection of the Green Belt, especially as the plan says past growth trends with future demands.

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

Epping (Draft Policy P 1):

No

Please provide reasons for your view on Epping:

SR.0587 is on employment site, next to another (EMP .0013) and in a very sustainable location near to the eastern entrance to Epping Station. SR .0556 seems to be (illegible) of the crime offices and most of it's staff car parking and if it's really not needed for it's current use should remain an employment site (sustainable location and re-use of modern offices) The draft plan has lots of scenic photos, but no examples of how significant number of houses (41,54,89) can be provided on car parks without a loss of spaces (the triangle symbol). So I object to god and useful car parks (demand for which will rise over the plan period) for any housing on SR -0349,0348 and 0229. Given the expected rise over the plan period, capacity at site SR-0229 needs increasing as it is already full and overflows into residential roads. but the Plan does address this problem. The plan recognises traffic problems in the High Street(there are also emissions affecting people at cafe outdoor tables) but doesn't address the problems. The number and distribution of housing sites in Epping and the effect of large allocation at North Weald in the plan will make things worse. I object to loss of hospital/health facilities implied by SR-0555. For a town set to grow I also object to the loss of leisure facilities

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implied by SR-0347. There are problems with other sites proposed for Epping, particularly road access and existing road conditions near sites to the north.

Loughton (Draft Policy P 2)

Please provide reasons for your view on Loughton:

Waltham Abbey (Draft Policy P 3)

Please provide reasons for your view on Waltham Abbey:

Chipping Ongar (Draft Policy P 4)

Please provide reasons for your view on Chipping Ongar:

Buckhurst Hill (Draft Policy P 5)

Please provide reasons for your view on Buckhurst Hill:

North Weald Bassett (Draft Policy P 6)

Please provide reasons for your view on North Weald Bassett:

Chigwell (Draft Policy P 7)

Please provide reasons for your view on North Weald Bassett:

Theydon Bois (Draft Policy P 8)

Please provide reasons for your view on Theydon Bois:

Roydon (Draft Policy P 9)

Please provide reasons for your view on Roydon:

Nazeing (Draft Policy P 10)

Please provide reasons for your view on Nazeing:

Thornwood (Draft Policy P 11)

Please provide reasons for your view on Thornwood:

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

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?

**Strongly disagree**

Please explain your choice in Question 7:

The Draft FDP, or a summary, should either have been appended to the plan or made available at public inspection points in hard copy along with the Draft Plan it Supports.

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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?

Object : various/many plans are unclear e.g proposed allocation and town centres have shades or grey backgrounds and no road names (even when referred to in text) so it's hard to orientate. Draft plan has no key diagram, nor overall district plan of site allocations unlike the '(illegible)' displays at inspection points.  
Object.

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Object : various references in plan to "hear circumstances e.g P42 (illegible) - 2 instances. As it's a local plan these local circumstances ought to be set out clearly.

Policy Number T2

Object Policy T2 : should specifically safeguard Epping - Ongar railway plus sites which would help better passenger access to stations for such time that consumer services reinstated.

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