

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

Stakeholder ID 2894 Name Brian Morton

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:

There are contradictory statements: on the one hand this says the Green Belt is protected, however Green Belt land is being used to extend the boundaries of the village with new housing proposed.

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:

Trying to infill housing by distributing around the district only puts a burden on already overstretched infrastructure facilities in each locality. In Theydon Bois the school and doctor's surgery are both oversubscribed, in fact the doctor's surgery is rated poor. The electricity supply is poor with constant black outs and piecemeal remediation works and repairs taking place. The TFL underground line is already at capacity, any train failure completely overloads the service to the point where Leytonstone can become dangerous. Additional housing along the Central line corridor will exacerbate the problems. New development should be focussed on towns where there are schools, shops, adequate NHS, adequate infrastructure services and where additional housing is not such a huge percentage growth. There is no detailed reason for an additional 360 homes in Theydon Bois. There are government guidelines to add to the Stanstead - Cambridge corridor. This was once achieved with a properly designed "new town" or "garden city". Piecemeal development without the infrastructure is a poor way of adding additional housing.

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

Agree

Please explain your choice in Question 3:

For the reasons stated above development should take place where there is an existing infrastructure including shops, transport, local centres, libraries, existing employment, brownfield sites for redevelopment, etc. Brownfield sites should always be used in preference to green belt land.

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

Epping?

Yes

Buckhurst Hill?

No opinion

Loughton Broadway?

Yes

Chipping Ongar?

No opinion

Loughton High Road?

Yes

Waltham Abbey?

No opinion

Please explain your choice in Question 4:

Any new Primary Shopping Areas should not undermine existing local facilities that are found within the smaller areas. The Langston Road development may test this. Housing, local employment and local retail are undermined by the District's approach to housing and employment sites. The strategy of the local plan should support existing shopping areas by developing housing and employment in the towns and settlements with existing primary shopping facilities. This will help protect and encourage retail trade, reduce travel, thereby providing local and sustainable support for the existing shops.

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

Strongly disagree

Please explain your choice in Question 5:

Any new employment should be primarily located within or close to the existing larger towns or settlements which are keen to expand in a sustainable manner with existing infrastructure. Green Belt constraints should limit employment sites, so the selection of employment sites should be carefully planned and not allocated "as appropriate", hoping that some land might become available.

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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:

TFL underground line is already at capacity, any train failure completely overloads the service to the point where de-training at Leytonstone can become dangerous. Additional housing along the Central line corridor will exacerbate the problems, which is why I have also stated NO to Epping, Loughton and Buckhurst Hill.

Loughton (Draft Policy P 2)

No

Please provide reasons for your view on Loughton:

TFL underground line is already at capacity, any train failure completely overloads the service to the point where de-training at Leytonstone can become dangerous. Additional housing along the Central line corridor will exacerbate the problems, which is why I have also stated NO to Epping, Loughton and Buckhurst Hill.

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

Please provide reasons for your view on Buckhurst Hill:

TFL underground line is already at capacity, any train failure completely overloads the service to the point where de-training at Leytonstone can become dangerous. Additional housing along the Central line corridor will exacerbate the problems, which is why I have also stated NO to Epping, Loughton and 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:

The infrastructure services in Theydon Bois cannot cope with the existing population, let alone a large percentage increase. •Theydon Bois local primary/junior school is oversubscribed, there is no local secondary school in Theydon Bois. •The local doctor's surgery is rated poor because of unavailability of appointments through oversubscription. It is part time working only and the only alternatives are Abridge and Epping (which

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are also over-subscribed). •The electricity supply is constantly flickering; we also suffer numerous black outs despite constant remediation works. •The water pressure is low, the distribution network was built for fewer houses and there has been much housing infill without increasing capacity. •The sewage network is already under pressure, recent collapses have occurred. •The TFL underground line is already at capacity, any train failure completely overloads the service to the point where de-training at Leytonstone can become dangerous. Additional housing along the Central line corridor will exacerbate the problems which is why I have also stated NO to Epping, Loughton and Buckhurst Hill also. The current green belt is delimited by the railway line. Any expansion to the East of the line would not encounter a natural boundary until the M11. Any expansion at the end of Forest Drive would again encounter no natural boundary. Overall, encroachment into the countryside would result in a loss to the open-ness of the area. The Green Belt boundaries should not be altered as part of this local plan because it does not contain any "special circumstances" that clearly out-weigh the harm. The option of loss of the underground station parking (even if only temporarily while being developed) would be a major impact on the parking in the village. Overall: It appears that the land designated for housing development is only what a landowner "wants" to sell; that this is a knee-jerk reaction to what is available rather than a considered and developed plan.

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:

There are only general statements about infrastructure provision; there are no quantifiable statements about when any infrastructure improvements or additions will be in place. There are no provisions to improve the existing poor infrastructure that we suffer in Theydon Bois and the proposals will not alleviate the existing issues.

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

With respect to Theydon Bois, the Sustainability Appraisal sets out the basis of assessing sites in the Green Belt. This was “to enable sufficient sites to be considered to maximise existing sustainable transport links within the settlement”. TFL is already at capacity and the underground station is poorly served by the existing roads and bus services. Commuter parking is deterred, so 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. I disagree that the wide dispersal of sites “will perform well with a range of sustainability objectives”. All villages identified for such development will still have to rely on the larger settlements for a wide range of facilities: shopping, libraries, secondary schools, doctors, dentists and employment opportunities. A better choice of shops will always be available in the existing larger towns, leading to greater dependence on cars, particularly in areas of poor bus services. This will add to congestion and further damage to the local roads. It will also not help protect the strategic role of the Green Belt in these smaller settlements. The Sustainability Appraisal is contradictory: •It states that the approach to the Green Belt sites will protect the most high value sites from development. •The document then states that high quality Green Belt land will be lost. The SA is correct to state that the loss of Green Belt land will have “significant negative effects”, but gives too much weight to the “no plan” scenario claiming the land would be lost anyway. Housing numbers alone are not classed as very special circumstances in law, and planning applications that breach clear, well-defined Green Belt boundaries should require a very strong case of very special circumstances, and even then permission for inappropriate development should not be forthcoming.

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

It is accepted that the local plan is a strategic document but it still needs to be able to provide certainty and understanding to developers, residents and community groups through the inclusion of more detailed development management policies. There are no detailed Green Belt policies that define disproportionate extensions in the Green Belt, or direct what is meant by ‘materially larger’. Once the Green Belt is lost, how do we manage redevelopment of previously developed land in the Green Belt? This all requires a consistent approach to be set at a District level and not left to an emerging approach through Neighbourhood plans. The overall design and infrastructure policies are very general and are not specific. There is no confidence that the allocated sites will take on board and respect the local character of Theydon Bois, e.g. the Dark Skies policy, particularly as some of the allocated sites are separated by the railway and its embankment and the existing village, such that there are very few visual linkages between the proposed sites. How will planning applications for the new housing coming forward be managed before a masterplan has been produced for the sites? As mentioned before, parking provision is not covered in the detailed policies of the Plan. What drivers are there for so many additional homes in Theydon Bois? Is it only because landowners have the opportunity to sell the land so we can fill the space with maximum number of houses? One further consideration is that with current low interest rates what incentive is there for home ownership as opposed to buy to let investment?
