

EFDC Draft Local Plan Consultation Theydon Bois Guidance Notes Extended Version

There are nine questions you can respond to in the consultation if you wish. Epping Forest District Council (EFDC) has a re-editable 'On-Line Response Form' on their website here: <http://eppingforest.consultationonline.co.uk/feedback/> where you can make your answers, but you are not obliged to use this.

You can get a hard copy of the questionnaire from the council offices in Epping, send them an E-Mail or write a letter. These must not be anonymous if they are to be valid. Write to Planning Policy Team, Civic Offices, High Street, Epping, Essex, CM16 4BZ.

When making your response you can answer only some of the questions if you wish. Think before you respond 'No Opinion' to any question as this might be interpreted as 'No Objection'. You do not have to use the tick boxes set out by EFDC and ticking these may allow an incorrect quick judgment in comparison to your following more considered answer.

Please only use the 'Guidance Notes' below to help you make an informed objection in planning terms. **Do not copy and paste them as answers.** It is possible that if you do they will be seen as multiple entries and discounted. It is also important to include your name and address details for the same reason as anonymous contributions will not be accepted.

Please try to write in your own words including your own knowledge and thoughts on why this proposal would be so harmful to Theydon Bois. In particular your own experience and evidence of the present infrastructure problems would be very relevant.

1. Do you agree with the overall vision that the Draft Local Plan sets out for Epping Forest District? (See paragraph 3.26, Chapter 3).

No. The vision seeks to protect the Green Belt, but the draft local plan fails to do this and will result in the loss of many clear and definable Green Belt boundaries.

NB. A clearly defined boundary is regard as a Major Roadway, Canal, Railway Line, River, Large Permanent Ditch or Natural Strong Field Boundary such as trees or large hedge, etc.

We do not agree that the proposed total housing numbers are needed for a natural growth in population in the district. The will encourage inward migration from London especially as developers will first move forward with and market the sites that will give them the most profit. These will be in the attractive villages. As it is 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 and there are no proper restraints to control the where & when the overall vision will not be achieved.

2. Do you agree with our approach to the distribution of new housing across Epping Forest District? (See Draft Policy SP 2, Chapter 3).

No. The incursions into the Green Belt have been ill-thought out, and there is no detailed justification for 360 new houses in and around Theydon Bois.

Central Government and Epping Forest policy states that when drawing up Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. This has not happened as the local plan seeks to locate housing and other development around all the settlements in the District, regardless of size, facilities, open space, employment, shops, etc... This is wrong and none of the evidence produced by EFDC supports this new approach to development. It is not in line with current Central Government thinking.

New development should be focussed on the towns in the District where they already benefit from good infrastructure and facilities and also have the space to provide additional associated development such as increased school capacity or larger doctor's surgeries.

NB. In planning terms "Sustainable Development" is development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

3. Do you agree with the proposals for development around Harlow? (See Draft Policy SP 3, Chapter 3).

While we believe it is more sustainable to focus development on towns, any approach that encroaches 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?

Creating Primary Shopping Areas should help focus retail development in these areas, but its implementation should not undermine existing local facilities that are found within the smaller settlements of the District.

Primary Shopping Areas face strong competition from larger centres and the internet but the creation of such areas are undermined by the District's approach to housing and employment sites.

The strategy of the local plan should support Primary Shopping Areas by focusing housing and employment development in the towns and settlements with Primary Shopping Areas. This will help protect and encourage retail uses

and shopping businesses in these new areas, thereby providing local and sustainable support for the shopping areas.

5. Do you agree with the proposals for new employment development?(See Draft Policy E 1, Chapter 4).

No. New employment opportunities should be directed towards the larger allocated sites close to, and within the towns of the District or 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? (See Chapter 5) Do not feel that you have to comment on all of the areas.

NB. This would be the most appropriate place to add your own knowledge or evidence of the present infrastructure problems in Theydon Bois, e.g. Public Transport, School Provision, Doctors, Water supply, Electricity supply, Sewage removal, flooding etc.

No. 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.

The local plan does not contain any very special circumstances that clearly 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? (See Chapter 6).

No, there does not appear to be any specific requirements for infrastructure, with most being generalised and difficult to quantify as part of a new development.

There is no guarantee that the infrastructure will be provided in the right place at the right time.

The infrastructure requirements only deal with the need arising from the new development and this in itself is unlikely to alleviate existing problems and shortfalls.

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. (See Technical Document page).

The Interim Sustainability Appraisal does not support the wide dispersal of development in and around the large and small villages of the District.

In respect of Theydon Bois, the Sustainability Appraisal sets out 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 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.

We disagree that the wide dispersal of development sites will perform well with a range of sustainability objectives. The large and small villages identified for such development will still have to rely on the larger settlements for a wide range of facilities. Libraries, secondary schools, doctors, dentists and employment opportunities. A better choice of shops will also be available in the towns. This all leads to greater dependence on cars, particularly in areas of poor bus services, and 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 recognises the importance in making more efficient use of urban open space, with the primary benefit being fewer of the more sensitive sites in the Green Belt being required for development. The SA recognises that the use of Green Belt sites would give rise to sustainability concerns. This is particularly the case for the villages around the District.

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 high quality Green Belt land will be lost.

The Sustainability Appraisal 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. Case Law has concluded that housing numbers alone are not classed as very special circumstances, and planning applications that breach clear and all clear and well defined Green Belt boundaries should require a very strong case of very special circumstances, and even then permission for inappropriate development would be very unlikely to be forthcoming.

It is therefore not accepted that high quality Green Belt land should be undermined by the Sustainability Appraisal, and indeed such high quality Green Belt land provides a strategic role that should be considered as showstoppers to any development.

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.

The policies are severely lacking for example, there are no detailed Green Belt policies such as to define disproportionate extensions in the Green Belt, or direct what is meant by 'materially larger'. How do we approach redevelopment of previously developed land in the Green Belt?

This all requires a consistent approach to be set at District level and not left to emerging guidance or even Neighbourhood plans.

Design and the infrastructure policies are very general and not specific. There is no confidence that the allocated sites will take on board and respect the local character of Theydon Bois, particularly as much of the allocated sites are separated by a railway and its embankment such that there are very few visual linkages between the proposed sites and the existing village.

How will you stop planning applications for the new housing coming forward before a masterplan has been produced for the site?

Parking provision is not mentioned in the detailed policies of the local plan.

Please try to make a full as possible response to EFDC before 12th December Deadline. Theydon Bois needs to show we care about the future of our village and these proposals are unacceptable.