

*Theydon Bois and District
Rural Preservation Society*
Affiliated to the Campaign to Protect Rural England

Registered Charity No. 286364
Established 1943



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14th October 2012

Issues & Options Consultation – Community Choices

Answers to Numbered Questions in EFDC Issues and Options Consultation Questionnaire:

- (Q1) **No.** There is no reference to the concept of ‘Localism’.
The Localism Act 2011 “sets out a series of measures with the potential to achieve a substantial and lasting shift in power away from central government and towards local people”. “They include: new freedoms and flexibilities for local government; new rights and powers for communities and individuals; reform to make **the planning system more democratic and more effective**, and reform to ensure that decisions about housing are taken locally”. “As part of neighbourhood planning, the Act gives groups of local people the power to deliver the development that their local community wants”.

As far as we know EFDC have not yet had any ‘Neighbourhood Plans’ submitted nor at this stage given any support to communities wishing to produce them (re. para. 1.11 “Our focus at this stage is to prepare a plan for the whole district.”). A number of communities have though prior to working on Neighbourhood Plans compiled Village Design statements.

Paragraphs 1.10 – 1.12 only consider Neighbour Plans at a later stage and make no mention of Localism. If the Localism Act is to have any real meaning in the preparation of our Local Plan then with the present lack of these Neighbourhood Plans EFDC should at this “Issues & Options” stage give particular weight to the wishes of local communities expressed in Village Design Statements where these have been submitted. These are detailed, have been properly researched, have evidence bases and clearly indicate the views of those communities that have produced them. They

probably will give a better balanced and more representative 'local view' than this consultation exercise.

- (Q2) **Yes**
- (Q3) **Yes.**
- (Q4) **Yes.**
- (Q5) In order of Merit Options **f, e, b, c.**
- (Q6) **No.** We believe there should be a further strategic Green Belt Gap between Theydon Bois and Abridge east of the Central Line railway, which is a clearly definable Green Belt Boundary. This would prevent ribbon development along the Abridge Road and prevent the eventual merging of the two communities (see 5 option b above). If ribbon or large scale development as in Theydon Bois C is allowed to breach this clearly defined Green Belt boundary it will eventually produce the 'urban sprawl' that it was the intention of the Green Belt to prevent.
- (Q7) **No.** Clearly land situated adjacent to Epping Forest and its Buffer Land will be richer in biodiversity than other sites. Epping Forest is a Site of Special Scientific Interest and should be safe from adjacent development as this will clearly impact upon the biodiversity of the forest itself. Biodiversity would inevitably be harmed by any building in the countryside. Biodiversity is dependant on the mosaic of fields, hedges and trees of what was, or still is, farmland; this must be preserved particularly in or near sensitive landscape sites and sites adjacent to SSI's. In developing the East of England Plan the evidence base led to Policy ENV7 on Air Quality. Bullet point 4 of that Policy stated:
"pay particular attention to any potential effects on wildlife, where potentially polluting development, increased motor traffic or intensive agricultural facilities producing ammonia, are expected close to sensitive habitats such as Sites of Special Scientific Interest (SSSIs)".
- (Q8) **No.** We doubt that many residents are much informed about biodiversity or even understand what it means. Most would regret the disappearance of a magnificent oak tree or woodland carpeted with bluebells. But most would be willing to sacrifice a rare wasp or rare snail or rare moss in order to provide affordable homes for the younger members of their families. Education of the general the public about the full importance of biodiversity issues in their area and detailed ecological surveys of development sites and the surrounding areas are needed before any development is allowed to proceed.
- (Q9) **No.** Reference to the proposed Conservation Area for Theydon Bois has been omitted.
- (Q10) **No.** The views of the community in Village Design Statements should be carefully considered and given considerable weight. See our answer to Q1 above.
- (Q11) We would agree all: In order of merit **a, c, b, d, e.**
- (Q12) **No.** There is no recognition of the pressure arising from London Growth and immigration from London to our district. Rural Communities in the district should not be expected to expand beyond their own inward requirements for growth. Developers will naturally build 'speculative' non affordable developments in potentially profitable rural communities and market these to

people dwelling in London. A case of build the homes and they will come. i.e. Inward migration will increase because the large scale development has encouraged it.

Ensure, by policy, the 'ring fencing' and prioritising of affordable housing in certain local rural communities for local residents and their families in perpetuity. This is done by a number of authorities in rural areas to protect village communities. Public land should be used for building new affordable housing and bring empty properties back into use. The governments 'New Homes Bonus' should be used for ring fenced community affordable housing schemes. Promote the formation of Community Land Trusts and support community led development projects.

- (Q13) The range of potential housing targets should be lower.
- (Q14) It should be lower owing to the fact that the 'Windfall' allowance only counts for five years. Clearly Windfall gains will continue beyond five years and may even increase due to changes and movements in the business sector.
- (Q15) **No.** Consider linking the development of local employment land to the development of local affordable housing thereby increasing sustainability.
- (Q16) **Yes.**
- (Q17) **Yes** with reference to HAR A, HAR-B and HAR-E. **No** with reference to HAR-D.
- (Q18) We support HAR A, B and E because although these sites are within the Green Belt and Harlow will clearly expand these would seem to be, taking everything into account, the least damaging options for the Green Belt. They represent the most sustainable options for Harlow and the surrounding areas and are most likely to provide Harlow with opportunities for much needed regeneration and economic development. HAR-B offers opportunities for integration into the existing infrastructure. The evidence base from the East of England plan was correct in showing that the best place for growth with the least harm to other communities was around Harlow. We do though object to HAR-D which is sited the wrong side of the 'ridge' and development in this location would be intrusive in the Green Belt.
- (Q19) Spatial option 4
- (Q20) **Yes.** 4 and 5.
- (Q21) **Yes.** Transport Focus – Proximity to mainline train stations and areas with good transport links of all kinds should be an option. Loughton, Grange Hill and Buckhurst Hill at present comprise approximately 25% of the districts population. The options all focus away from Loughton and Debden despite the capacity of the Loughton/Debden conurbations to take some further development and that development here would be more sustainable than in rural areas. It is most likely that these communities will see the biggest gain in Windfall sites and they have the biggest potential for both Brownfield development and the relocation of uses of land to the edge of settlements to free up urban land for development as in Q5 option d. They have at present the best transport infrastructure with not only the Central Line, but very good bus links to other underground and mainline stations and throughout the district. Although the Central Line is at capacity this is because the commuters joining at Epping & Debden reduce the capacity further down. This will be exacerbated by further expansion of rural communities in the district. Focus should be away from the Central Line in these areas as this is more sustainable. Because

Loughton is something of a transport hub, alternative commuter routes can be more easily found. See also answer to Q90.

(Q22) **Yes**

(Q23) Support BKH – 2

(Q24) No Comment.

(Q25) No Comment

(Q26) No Comment)

(Q27) No Comment

(Q28) No Comment

(Q29) No Comment

(Q30) No Comment

(Q31) No Comment

(Q32) No Comment

(Q33) No Comment

(Q34) No Comment

(Q35) **No.** Epping F and G should not be included (see answer 38 below). Epping F and G fall at least in part within the strategic Green Belt Gap indicated in blue in diagram 3.1; there would be an adverse impact on the Green Belt and Theydon Bois and Epping Forest which is a triple SSSI. Biodiversity would also be adversely affected. See answer to Q7.

(Q36) No comment.

(Q37) No Comment

(Q38) We object to options F and G.

(Q39) Epping F and G fall at least in part within the strategic Green Belt Gap indicated in blue in diagram 3.1; there would be an adverse impact on the Green Belt and Theydon Bois. See our answer to Q35 above.

(Q40) **No** Areas 1 – 11 are given the lower status (in orange) of “potential opportunity areas” rather than (red) growth options. We are of the opinion that as Loughton, Buckhurst Hill and Grange Hill total nearly 40% of the districts population, have the best local employment opportunities and transport links it is sensible to look critically at these and all development and infill populations here first before targeting rural communities and the Green Belt.

(Q41) No detailed comment, but see answer to Q40.

(Q42) No comment.

(Q43) No comment.

(Q44) No comment.

(Q45) No comment.

(Q46) No comment.

(Q47) No comment.

(Q48) No comment

(Q49) No comment.

(Q50) No comment.

(Q51) No comment.

(Q52) No comment.

(Q53) No comment.

(Q54) No comment.

(Q55) No comment.

(Q56) **No** The possibility of a mixed use of some housing, business and aviation does not seem to be given sufficient weight.

(Q57) **No** While we would not support the transfer of the use of the airfield site (much of which is Green Belt) over to large scale housing development (this was originally considered in the East of England Plan, but ultimately rejected by them), we think strong consideration should be given to locating some housing as part of mixed development to the southern area of the site using parts of A, B, C & D.

(Q58) No comment.

(Q59) No comment.

(Q60) No comment.

Theydon Bois

The more detailed views of the community in the Theydon Bois Village should be considered as well as the answer below.

(Q61) **No.** Theydon Bois's own growth needs can be met by Windfall gains and infill. Within the Village previously developed land has been used for housing over the last 20 years e.g.

the old railway sidings, the builder's yard, Wood and Krailing's and Tid's Garages, Wansfell College. Within the timescale of the new Local Plan, Darlington's garage and The Railway Arms sites will follow this pattern and as a proportion will be some 10% of the dwellings in the Village. Redevelopment of existing houses, infill and conversion of houses to flats has delivered on average 3 new properties a year (Ref: Planning applications to EFDC) Potential future development sites include the Telephone Exchange and the Flower Yard in Loughton Lane and unfortunately in the present economic climate Theydon Bois is likely to lose another of the three remaining public houses.

There needs to be some consideration of proportionality when considering options for expansion throughout the district. What are Theydon Bois's own needs here that will not encourage speculative development and encourage unsustainable inward migration? The delivery of sustainable housing should be closely linked to locations that minimize commuting, and promote more sustainable communities, and a closer relationship between jobs and existing or proposed labour supply.

The Theydon Bois population is approx 4,000 (ward profile). This is approx 3.0% of estimated 124,700 estimated 2010 population. District population is expected to increase to 142,900 in 2033 or by 13.8% (including a high proportion from inward migration). Increasing Theydon's population by 13.8% to 2033 gives 522 people divide this by 2.4 (approx household occupation average. Source 2011 dia. 2.5, although this seems a low occupation figure) = 230 new homes. Yet if all of the options for Theydon were adopted we are expected to accommodate 1266 new homes. Clearly this is disproportionate, unsustainable and would encourage further inward migration turning Theydon Bois, which has little employment of its own into a 'dormitory town' for London. With an expansion of this size Theydon could no longer be described as a village and any sense of village community will be lost. We would maintain excluding inward migration the growth needs within Theydon's own community is much less than 230 homes and could be met by the Windfall gains and infill as it has been in the past and stated above, but if the slightly wider window of the last 25 years is considered (this then covers developments such as Slade End) then total of new homes is in excess of 250 (source ref; the society's monitoring of Theydon Bois Planning applications to EFDC over this period).

Clearly if Spatial Options 4 & 5 in Q19 & Q20 are genuine options then development away from the Central Line should be a key requirement.

See also answers to (Q62) and (Q63) and Theydon Bois Village Design Statement.

(Q62) **No to all** i.e. We object to all of TBH-A, THA-B and THB-C. (NB. these are incorrectly stated as TBA – A to C in the question).

(Q63) **Theydon Bois (THB – A)**

The more detailed views of the community in the Theydon Bois Village should be considered as well as the answers below.

Impact on Green Belt and Landscape:

This site should really form part of the strategic Green Belt Gap shown in Diagram 3.1 – but not shown on page 143.

Given the visually significant slope and lie of the land, any development of this site would be very highly conspicuous thus being to the severe detriment of the openness of the Green Belt (both when viewed from the surrounding Green Belt and from the built environment within the Village of Theydon Bois.)

There is a clear boundary between this site and the existing built settlement. This is a very distinct and established boundary comprising a public footpath, watercourse and ancient tree/hedge line. The NPPF states “*Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period*”.

This is good agricultural land for which there will be an increasing need in the future. Economists predict that food prices will continue to rise over the next 20 years and so will the need for good agricultural land within the United Kingdom. “Food Miles” will also impact food prices and our ‘carbon footprint’. There will be a substantial need for good agricultural land close to London. This site should be retained and developed for its present agricultural use.

Developing this land would be in conflict with the extant Theydon Bois Tree Strategy and some of the policies in Appendix A on page 27.

EFDC’s Landscape Sensitivity Study rates this land highly under 9.7.2 In relation to Paragraph 1.6 of PPG2, the landscape setting to Theydon Bois is considered to play a role in fulfilling the following objectives:

To provide opportunities for access to the open countryside for the urban population:

An interconnected network of key pedestrian routes cross the landscape, connecting Theydon Bois and its landscape setting with adjacent landscapes;

To provide opportunities for outdoor sport and outdoor recreation near urban areas:

There are several areas of urban green space at the settlement edge;

To secure nature conservation interest:

There are several sites of nature conservation interest and areas of Ancient Woodland within the landscape setting to the settlements;

To retain land in agricultural, forestry and related uses.

A relatively high proportion of the land within the landscape setting of Theydon Bois is under one of these uses.

Specifically the table 9.5.2, Landscape setting area 2 (we consider this includes most of THB-A - Fig 9.4a) is recorded as 'high' on all visual sensitivity columns and comes out moderate overall sensitivity to change. This is only due to a low score on column relating to 'number of sensitive, natural, cultural and historic features'. Although we concur with the high visual sensitivity rating we consider that given the proximity to Epping Forest and its buffer lands the moderate rating is under stated for this particular subsection of Landscape Setting Area 2. Still the consultant’s conclusions are clear enough: “*Drawing on the above analysis, those Landscape Setting Areas identified as high or moderate overall sensitivity are considered desirable to safeguard in landscape*”

terms and are considered to have a significant role in contributing to the structure, character and setting of the settlement Landscape Setting Areas”

The land on this site is contiguous with the Epping Forest Buffer Land and their associated Bio Diversity issues. Any proposals should secure effective protection of the environment by considering the nature and location of proposed development as part of a broadly based concern for, and awareness of, biodiversity and other environmental issues, including light and noise pollution. We are of the opinion that this site should be exempt from development as it fails to meet these criteria. It does though provide part of a connected network of accessible multi-functional green space on our village fringe and adjacent to the forest and this value should not be under estimated.

Traffic impact:

Access to the site constricted by narrowness of approach road, Forest Drive/Dukes Avenue, and throughout village and it would be difficult make highway infrastructure improvements.

As Theydon has little employment opportunities residents here are likely to be commuters to London and this would have a further impact on the Central Line and Theydon Bois station. Already during rush hours some commuters joining the train at Theydon Bois prefer to take the train to Epping and remain on it to ensure a seat. This Central Line congestion is recognised in Q 19 – (Harlow Option 4/5 and para 7.6, page 186) where the options consider that development should be away from the Central Line.

Impact on Services:

Our Primary school is at present at capacity and would need a considerable upgrade to accommodate expected pupil numbers generated by developing THB-A
Our Doctors’ surgery in the village is a satellite of the Limes, Epping and already it closes for long periods without notice due to lack of Doctors. Villagers already have difficult in making early appointments in both Theydon Bois and Epping. Because Doctor Provision is via Epping growth in either community is likely to impact adversely on this provision.

Impact on Utilities:

Essex is the driest county in England, and one of the fastest growing. Water resources are limited and there are already supply-demand issues in parts of our district. In preparing this local plan full account should be taken of the Environment Agency's warnings in the Regional Water Resources Strategy, catchment abstraction management strategies, groundwater vulnerability maps and groundwater source protection zone maps. The area around Theydon Bois shows an unsustainable or unacceptable extraction regime.

The sewage system already exceeds capacity on occasion with many blockages and flooding particularly in Poplar Row and Coppice Row. Majority of sewage pipes throughout village are as originally installed at the end of the 19th century and are inadequate. A considerable investment in upgrading infrastructure would need to be made both within the village itself and to sewage plant within the district to ensure adequate provision of sites with sufficient capacity for the collection, storage, treatment, processing, recycling and disposal of sewage from Theydon Bois. The CIL is unlikely to provide sufficient funding for such infrastructure changes and Thames Water, the utility company, seem to show a reluctance to make infrastructure improvements.

There are similar electrical supply restraints. Our village often experiences power cuts. The Electrical Supply Company continually have to repair the wiring infrastructure much of it dating from 1928.

Flood risk:

Building on this land would further create water run-off from the forest and higher land in times of heavy rainfall and aggravate surface water flooding in the village caused by water run-off from the forest in times of heavy rainfall. The lower parts of the village around Coppice Row regularly experience some flooding and there were serious floods throughout the lower parts of the village in 1982.

(Source: <http://www.theydon.org.uk/Flooding%20in%20Theydon%20Bois/default.htm>)

Climate warming would suggest increased rainfall in our area in the future and rainfall run off flood prevention would be needed.

Heritage:

Theydon Bois is a Forest Village with an important Village Green. It at present has a population of approximately 4,000 which is about the limit to still be considered as a village. A new Conservation Area for the village has been recommended in para.3.14 (page 16). Substantial growth, infrastructure changes and increased traffic and associated pollution would adversely impact on this conservation area. A key element in this proposed Conservation Area is the 'iconic' 'Avenue of Oaks'. City of London Conservator's surveys have already indicated that the avenue is suffering badly from pollution and root compaction and dying prematurely due to road traffic impact. Some trees have already been felled for safety reasons and a second avenue recently planted, but the success of this planting and the longevity of the present avenue will still be subject to the effects of traffic.

In developing the East of England Plan the evidence base led to Policy ENV7 on Air Quality. Bullet point 4 of that Policy stated:

"pay particular attention to any potential effects on wildlife, where potentially polluting development, increased motor traffic or intensive agricultural facilities producing ammonia, are expected close to sensitive habitats such as Sites of Special Scientific Interest (SSSIs)"

We see no evidence for the abandonment of such a policy.

Developing this land would be in conflict with the extant Theydon Bois Tree Strategy and some of the policies in Appendix A (page 27).

Impact on Residential Amenities:

As the site is on a rising slope overlooking many dwellings any new development would be intrusive to residents in Dukes Avenue,

This site has a long established and valuable amenity value to local residents and is crossed by important linking footpaths. There is a long history of all year round use for recreational activities.

The land on the site rises steeply to the north east and any dwellings here even without street lighting would impact adversely on the present village Dark Skies Policy.

Theydon Bois (TBH – B)

The more detailed views of the community in the Theydon Bois Village should be considered as well as the answers below.

Although this is a smaller site than THB-A & C the addition of 68 new homes would still impact on infrastructure as noted in our objections to THB – A & THB – C.

Impact on the Green Belt and Biodiversity from the construction of 68 homes would be very damaging here as although this is a small site, it abuts the forest. Epping Forest is a Site of Special Scientific Interest and also a Special Area of Conservation, under the European Union's Habitats Directive. We believe that the City of London, Epping Forest Conservators are opposed to development here.

Previous planning applications for development here have been refused by EFDC and these refusals have been upheld on appeal to the Planning Inspectorate. The main reason for refusal here has been because of inadequate highway sight lines on Coppice Row, even though the dwelling numbers and density are much less than in this option (ref. source EFDC Planning Applications).

Theydon Bois (TBH –C)

The more detailed views of the community in the Theydon Bois Village should be considered as well as the answers below.

Impact on Green Belt & Landscape

NPPF states that Green Belt boundaries should be clearly delineated. The railway line to the east of the village is one such boundary;

As we stated in our answer to Q (6) there should be a strategic Green Belt Gap between Theydon Bois and Abridge to prevent 'ribbon development'. (ref source NPPF

"Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period"). If the land in THB – C was developed it would be impossible to define the intended long term permanence of a boundary.

EFDC's Landscape Sensitivity Study rates this land highly under 9.7.2 In relation to Paragraph 1.6 of PPG2, the landscape setting to Theydon Bois is considered to play a role in fulfilling the following objectives:

To provide opportunities for access to the open countryside for the urban population:

An interconnected network of key pedestrian routes cross the landscape, connecting Theydon Bois and its landscape setting with adjacent landscapes;

To provide opportunities for outdoor sport and outdoor recreation near urban areas:

There are several areas of urban green space at the settlement edge;

To secure nature conservation interest:

There are several sites of nature conservation interest and areas of Ancient Woodland within the landscape setting to the settlements;

To retain land in agricultural, forestry and related uses.

A relatively high proportion of the land within the landscape setting of Theydon Bois is under one of these uses.

Specifically the table 9.5.2, Landscape setting area 2 (we consider this includes most of THB-C - Fig 9.4a) is recorded as 'high' on all visual sensitivity columns and comes out moderate overall sensitivity to change. This is only due to a low score on column relating to 'number of sensitive, natural, cultural and historic features'. Although we concur with the high visual sensitivity rating we consider that given the proximity to the new Theydon Wood, the Green Arc (see below) and as it encompasses two historic 18th/19th Century field pockets the moderate rating is understated for this particular subsection of Landscape Setting Area 2. Still the consultant's conclusions are clear enough:

“Drawing on the above analysis, those Landscape Setting Areas identified as high or moderate overall sensitivity are considered desirable to safeguard in landscape terms and are considered to have a significant role in contributing to the structure, character and setting of the settlement Landscape Setting Areas”

The importance of this landscape and agricultural land abutting the Thrifts Hall Farm Ridge is also recognised on page 18 of the Theydon Bois Tree Strategy.

This site abuts the new Theydon Wood, planted by the Woodland Trust with donations and help from this Society and many others in Theydon Bois. This new wood and Theydon Bois Cemetery can be accessed by Footpath 10 that runs from the foot bridge in Green Glade, Theydon Bois and provides a useful new recreational facility not only for the residents of Theydon Bois, but the many visitors and walkers that are now encouraged by the Woodland Trust to visit. Building on this site would severely impact on the setting of the wood and restrict pedestrian access. The proximity of the buildings to the wood, especially during the construction stage could be harmful, especially as it has many years to go before reaching a mature state. One would hope that the Forward Planning Team have already consulted the Woodland Trust about this option.

Development here would impact on biodiversity and the free movement of wildlife between Epping Forest and the new Theydon Wood and be detrimental for the appropriate management and further expansion of wildlife corridors that are important for the migration and dispersal of all forms of wildlife throughout the district and beyond as the new wood itself forms also part of the 'London Green Arc'. In 2005 the East of England Plan considered that;

“the 'London Arc' addresses the strongest dilemma for regional strategy – protection of green belt areas, versus the need to allow sustainable development in key London fringe towns and to redress unsustainable commuting patterns by creating a closer relationship between homes and jobs. The strategy proposes selective green belt reviews around key towns, primarily those with regeneration needs and/or offering the greatest potential”.

We see no reason to disagree, that in our district growth should be targeted around the key towns, i.e. Harlow, Loughton & Waltham Abbey and away from rural communities especially those adjacent to the Green Arc.

If Theydon Wood is allowed to fully mature within a proper wildlife corridor and landscape setting it has the potential to become an SSSI.

Agriculture:

The southern end of this site option at present encompasses an active “Sheep & Goat” Milking Farm that at present employs only a few people directly, but indirectly

it supports a large factory in Kings Cross with many more employees. Its proximity to this part of London contributes to low food miles and a lower carbon footprint than would result if it was forced to relocate. The farm also connects Theydon's residents, especially its children, with our village's agricultural past and the importance of this should not be overlooked.

Traffic impact:

Access and particularly egress to/from the site from Abridge Road would have an adverse effect on highway safety as has been recognised in refusal or conditions made to many previous planning applications for developments adjoining Abridge Road.

As Theydon has little employment opportunities residents here are likely to be commuters to London and this would have a further impact on the Central Line and Theydon Bois station. Already during rush hours some commuters joining the train at Theydon Bois prefer to take the train to Epping and remain on it to ensure a seat. This Central Line congestion is recognised in Q 19 – (Harlow Option 4/5 and para 7.6, page 186) where the options consider that development should be away from the Central Line.

The development of 1,000 homes in a development with a complex road structure close to Theydon Bois station would encourage an increase in unsustainable cross district commuting by car to this Central Line station unless all these roads had parking restrictions. We believe we supplied good evidence of the number of cross district commuters already seeking to park for free (the key factor) in the Society's submission to Planning Application EPF/1134/10 Commuter Car Park on the Old Foresters site. Unless there is a proper integrated fare structure between Mainline and Transport for London, commuters will continue to drive to Central Line stations where they can find free on road parking nearby.

Impact on Services:

Our Primary school is at present at capacity and a second and much larger school would be needed to accommodate such a development.

The Doctors' surgery in our village is a satellite of the Limes, Epping and already closes for long periods without notice due to lack of Doctors. Villagers already have difficulty in making early appointments in both Theydon Bois and Epping. At least one much larger surgery would need to be built in Theydon Bois to accommodate the increased population. Population growth in Epping would also impact on Theydon Bois because Doctor Provision is via Epping.

Impact on Utilities:

Essex is the driest county in England, and one of the fastest growing. Water resources are limited and there are already supply-demand issues in parts of our district. In preparing this local plan full account should be taken of the Environment Agency's warnings in the Regional Water Resources Strategy, catchment abstraction management strategies, groundwater vulnerability maps and groundwater source protection zone maps. The area around Theydon Bois shows an unsustainable or unacceptable extraction regime.

Sewage system already exceeds capacity on occasion with many blockages and flooding particularly in Poplar Row and Coppice Row. Majority of sewage pipes

throughout the village are as originally installed at the end of the 19th century and are inadequate. A considerable investment upgrading infrastructure would need to be made both within the village itself and to sewage plant within the district to ensure adequate provision of sites with sufficient capacity for the collection, storage, treatment, processing, recycling and disposal of sewage from Theydon Bois. The CIL is unlikely to provide sufficient funding for such infrastructure changes and Thames Water, the utility company, seem to show a reluctance to make infrastructure improvements.

There are similar electrical supply restraints. Our village often experiences power cuts. The Electrical Supply Company continually have to repair the wiring infrastructure much of it dating from 1928.

Heritage:

This site is rich in ancient and important trees. There are 48 Tree Preservation Orders on the site (ref. source EFDC Countryside and TB Tree Wardens).

Land comprising this site was referred to in EFDC's 'Landscape Sensitivity Study 2009' as a 'Sensitive Historic Landscape and contains two small pockets of 18th/19th Century Enclosure'.

Theydon Bois is a Forest Village with an important Village Green. It at present has a population of approximately 4,000 which is about the limit to still be considered as a village. A new Conservation Area for the village has been recommended in para.3.14 (page 16). Growth on this scale (1,000 new homes) with the associated infrastructure changes needed would adversely impact on this conservation area. A key element in this proposed Conservation Area is the 'iconic' 'Avenue of Oaks'. City of London Conservator's surveys have already indicated that the avenue is suffering badly from pollution and root compaction and dying prematurely due to road traffic impact. Some trees have already been felled for safety reasons and a second avenue recently planted, but the success of this planting and the longevity of the present avenue will still be subject to the effects of road traffic. 1,000 new homes would probably equate to approximately 1,500 additional cars located in Theydon Bois with the associated pollution causing further damage to the Avenue and the triple SSI Epping Forest.

In developing the East of England Plan the evidence base led to Policy ENV7 on Air Quality. Bullet point 4 of that Policy stated:

"pay particular attention to any potential effects on wildlife, where potentially polluting development, increased motor traffic or intensive agricultural facilities producing ammonia, are expected close to sensitive habitats such as Sites of Special Scientific Interest (SSSIs)"

We see no evidence for the abandonment of such a policy.

Impact on Residential Amenities:

A large scale development of up to 1,000 homes on this site, even if allowed without street lighting, would be detrimental to our Village Dark Skies Policy.

Public footpath 10 traverses the site and at present provides a 'peaceful and contemplative, access to Theydon Bois Cemetery'. It also provides access to the new Theydon Wood and is well used by ramblers and dog walkers. As the wood matures and peoples awareness of it as a recreational resource increases so will use of this footpath.

Any development would adversely affect the amenity and enjoyment of this footpath.

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- (Q64) **No.** There should be a strategic Green Belt Gap between Thornwood and Epping to prevent ‘ribbon development along the B1393 and the coalescing of these two communities.
- (Q65) No comment
- (Q66) No comment.
- (Q67) No comment.
- (Q68) No comment.
- (Q70) **Yes** Waltham Abbey already comprises approximately 20% of the districts population. It has relatively good employment opportunities as well as excellent transport links, especially its proximity to Mainline Stations with quick and direct links to London. It is therefore a more logical development area than more rural areas. There are a number of options here that provide suitable development and growth opportunities with little impact on the Green Belt.
- (Q71) No detailed comment, but see our answer to Q70.
- (Q72) No comment.
- (Q73) No comment.
- (Q74) **No.** There is insufficient clarification on provision for Gipsies and Travellers.
- (Q75) **No.** In general densities must be more closely tied to the existing density of the location in question, but if small infill locations are chosen then there is a good case for ‘site specific’ higher densities (e.g. small flats, instead of houses). For instance in Theydon Bois higher density windfall or infill developments like ‘Theydon Gate’ and Octave House provided a substantial amount of growth in a rural community before any consideration needed to be given to green Belt options.
- (Q76) **Yes**, but see response to Q 75.
- (Q77) Mixture of densities.
- (Q78) **Yes.**
- (Q79) **Yes.** Should be higher. Really there needs to be some sliding scale where small developments, particularly in rural communities, should have a much higher percentage and a ‘ring fenced’ policy for these houses. See our answers to Q78, Q75 and Q12.
- (Q80) **Yes.**

- (Q81) **No.** See our answer to Q (74). Research shows that neither community wishes to live next to one another.
- (Q82) **No.** Impact of the development on local high streets, particularly in rural communities, of ‘out of town’ supermarkets that are within district is not properly addressed. These adversely affect small shop owners, the elderly who have limited ability to travel and produce unsustainable traffic movements.
- (Q83) **No.** See our answer to Q82.
- (Q84) No comment.
- (Q85) **No.** Paragraphs 6.23 – 6.28 seem only to refer to retail and financial businesses. Land for ‘High Tec’ and manufacturing. Land for ‘Logistics and storage use.
- (Q86) **No.** The importance of Farming and need for retaining agricultural land for the future has not been considered.
- (Q87) **No.** See answer to Q 86. Most economists agree that food prices will continue to rise due to increased world shortages of staples like grain (wheat). There is also the need to meet the UK’s Carbon emission targets. We need to be more self sustainable, with lower ‘food miles’ and a lower ‘carbon footprint’. There will be a growing need for agricultural land close to London in the years up to 2033. We need to preserve as much agricultural land as possible in our district and promote its return to farming use. We need to look at as many ways as possible to boost the Rural Economy rather than encourage its demise.
- (Q88) No comment.
- (Q89) No comment.
- (Q90) **No.** There is a need to pressure national and London administrations to address the integration of the different fare structures between National Rail and Transport for London. At present there is a lot of unsustainable into district and cross district traffic movements by commuters seeking to access the cheaper Central Line route into London. This adversely affects the Central Lines capacity and causes parking problems in communities with Central Line stations as most of these commuters are seeking to park for free to lower their total travel costs. See also our answers to Q63 THB – C.

No acknowledgement made of use of existing bus services and the transport hubs of Harlow, Loughton/Buckhurst Hill and Waltham Abbey.

The impact of increased traffic at Junction 5 of the M11 is not taken into account. The practical effect of the present Junction arrangement is to put traffic through the Forest. Increased traffic will exacerbate pollution further damaging the forest.

- (Q91) **No.** 7.4 & 7.5 do not consider the particular importance of pollution on SSIs and the need for higher standards for air quality and carbon reduction in and close to these areas.

Two parts of 7.6 seem to be contradictory? Development should be away from the Central Line.

7.7 do not address fare integration. See our answer to Q90.

- (Q92) **No.** The ability of the CIL to deliver the infrastructure changes needed in the present economic climate is doubtful and needs to be reviewed. We assume that when the consultation document was being drafted the view was that the national economy would grow by 4% per annum. The recent predictions by the IMF and most economists are that UK growth will be -0.4% for 2012 and will 'flat line' for the foreseeable future. Developers are probably more likely to fund infrastructure for large scale schemes in key towns where the present capacity is greater and implementation is likely to be less costly than for significant developments in rural areas, e.g. THB – C.

In 2005 the East of England Regional Assembly rejected its own plan because central government would not commit to the significant investment in social, environmental and physical infrastructure needed. There is a need to ensure that guarantees regarding infrastructure are made before development can proceed. It is more likely that infrastructure changes will be less costly to implement overall and more investment favourably looked upon by central government.

- (Q93) **No.** The direct relationship between water supply shortfalls and housing numbers proposed is not properly addressed.

- (Q94) **No.** See 93. Essex is the driest county in England. There needs to be careful consideration on a regional level of the infrastructure needed to meet new housing demands.

- (Q95) **Yes.**

- (Q96) **No.** Weight should be given to the views outlined in Village Design Statements.

- (Q97) **Yes** we would like to add the following additional comments and summary of our views with particular regard to Theydon Bois.

In 1943 the Theydon Bois and District Rural Preservation Society was formed with the aim of preserving the rural character of the countryside in and around Theydon Bois as an appropriate and natural complement to Epping forest and to resist all attempts of encroachment on the Green Belt.

Today the majority of the households in the Village are subscribers and the Society was actively engaged in the preparation of the Village Design Statement which has been recognised by the District Council.

In the 2007 Village Design Statement Questionnaire 96.1% of respondents considered; *"It is very important that the village should retain a green area around it to keep it a separate entity"*.

86.2% considered that;

"The Metropolitan Green Belt should be preserved at all costs".

89.0% considered that;

“Despite current pressures on housing we should resist any compromise of our Metropolitan Green Belt”.

94.5% considered that;

“The protection/retention of Epping Forest and 'buffer land' is important”.

At present the coalition government seems to be voicing ambiguous views in planning statements with regard to the Green Belt, but last year the Society received a letter from the Government Minister Greg Clark about the NPPF (this has previously been forwarded to Ian Wright by the Society) in which he echoed our aims when he wrote *“The Framework also sets out how local councils through their plans, will be under a national requirement to bring forward land of the least environmental value before land of higher environmental value. And it will be possible for them to specify explicitly that they will prioritise the re-use of previously developed land.”*

Theydon Bois is unique in that it can be described as a ‘Forest Village’ with Epping Forest forming its large central village green and the Society believes that its character is worthy of special consideration and protection.

To summarise the retention and protection of the Green Belt around rural communities with strategic gaps is a top priority for the Local Plan. If villages are allowed to coalesce or over expand they will lose their individuality and special characteristics and just become part of a greater ‘urban sprawl’.

We are of the opinion that the district growth needs are better met and less damaging if growth is centred on the major conurbations of Harlow, Loughton and Waltham Abbey. Harlow in particular is in need of and would welcome regeneration. These towns have better employment opportunities and have a more sustainable transport infrastructure away from the over pressured Central Line.

We believe that the essential needs for growth within rural communities are better met by the long-term consideration of all ‘windfall’ gains and infill development.

A Local Plan that gives serious consideration to the implementation of such a strategy would receive our society’s full support.

Yours Faithfully,

J.F. Watts
Secretary
Theydon Bois & District Rural Preservation Society