



TB&DRPS Response to EFDC Draft Local Plan Consultation

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).

Strongly Disagree

Theydon Bois & District Rural Preservation Society was formed in 1943 with the aims of preserving the rural character of the countryside in and around Theydon Bois as an appropriate and natural complement to Epping Forest. It was among those organisations that promoted the idea of ‘Green Belts’ around major towns to prevent urban sprawl. In 1947 the Town and Country Planning Act allowed the local authorities to include Green Belts in their town plans. Since the formation of the Green Belts around London in the 1950’s one of the Society’s main aims has been to resist all attempts of encroachment on the Green Belt.

In England Green Belts cover less than 13% of the total land area and Green Belt policy in the UK has been shown to be highly effective in halting the urban sprawl and improving the quality of life for both rural and urban populations. **The ‘Vision’ in the Draft Local Plan 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.**

The National Planning Policy Framework and the 2015 Conservative Manifesto stated clearly that Ministers attach great importance to the Green Belt and **will maintain existing levels of protection.** In his letter to all Members of Parliament for English Constituencies Minister of State for Housing and Planning (Brandon Lewis) stated that *“The Government has put in place the strongest protections for the Green Belt.”*..... *“and that Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process and with the support of local people. We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries.”*

Permanence is an important feature of the Green Belt. Releasing just a small percentage of Green Belt sounds an attractive way of releasing land for housing, but once bits of the Green Belt are removed, the integrity is reduced and so its benefits begin to be lost. Building in the Green Belt is not a solution to housing needs as it will lead to unsustainable commuting with more people choosing living outside the major cities and ‘leapfrogging’ over the suburbs into city centres.

The Draft Local Plan for the Epping Forest District would require the release of approximately 1.5% of current Green Belt land in the district. This proposal should not just

be looked at in isolation even bearing in mind the constraints of 92.4% of the district lying in the Green Belt. Many other LPA districts with land in the London Metropolitan Green Belt have or are producing Local Plans that will also alter Green Belt boundaries and remove land from the Green Belt for development. The above Government guidance is clearly stated “***We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries.***” While it is important that Central Government takes ownership of a solution that allows development, but causes no harm to the Green Belt, LPA’s should not interpret “*Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process and with the support of local people*” as a licence to individually remove or develop on Green Belt land in their own district. Such an individual approach will cause incalculable harm to the London Metropolitan Green Belt and we do not believe it has the support of Local People. The ‘Vision’ for the local plan is for actively seeking to maintain “*the Metropolitan Green Belt where it continues to make a contribution to its nationally defined purposes*”, an individual based approach, and especially one that does not have “*the support of local people*” will not meet this ‘Vision’. Our Society has an individual membership of approximately 1,700 people in Theydon Bois (confirmed by our subscription collection books). **We find there is no support from our members for building housing in the Green Belt.**

The Council considers “*that the need to promote sustainable patterns of development to meet objectively assessed needs for development in the District over the Plan period requires some alteration to the Green Belt Boundaries and that failing to deliver development to meet those needs would not contribute to the achievement of sustainable development in accordance with national planning policy. Therefore, the Council considers that exceptional circumstances have been demonstrated to alter existing Green Belt boundaries as proposed in the Draft Local Plan*”. There has only been a very broad approach to assessing the proposed Green Belt sites in the Draft. Whilst some work has been carried out on the potential of the sites for development, there has been a lack of detailed evidence to support the claims of ‘Exceptional Circumstances’ and therefore the above criteria has not been met.

Housing figures in the Draft Local Plan do not actually support the proposed level of changes to the Green Belt boundaries. The number of housing units needed once the sites around Harlow have been taken into account along with completions and sites with planning permission is 4550 dwellings. Draft Policy SP 2 sets out the list of sites around the District and the total expected numbers of houses from these sites is 7390. Section 3.62 of the draft local plan gives the reason for this over provision as being a “*contingency to allow for flexibility*” to cover “*eventualities outside the control of the Council*” such as stalled sites. **This amounts to a 63% ‘contingency’!** Clearly there must be a lot of “*eventualities outside the control of the Council*”. It indicates that the Draft at this stage does not benefit from enough detailed work on assessments of the proposed sites for their viability and sustainability and the council are expecting a high level of ‘redundancy’. Most other LPA’s that have plans in place or ready for consultation have allowed for a contingency of between 5% & 15%. These percentages seem to be an acceptable figure to the Planning Inspectorate for Examination under Regulation 22. The Draft appears to have been rushed onwards after ‘Issues and Options’ to meet deadlines rather than being a document suitable for a proper consultation in its present state.

The Draft Plan also suggests that household trends demonstrate a further need for housing, and the over provision of sites is evidence of “*positive planning*” by the Council. Again the Council’s figures are excessive as growth purely from within the District is “fairly small”, about 200 a year, as stated by EFDC in their Issues & Options Consultation Document. In the draft ‘Fig. 2.8 Births & Deaths’ within the district show a yearly increase of Births over Deaths of approximately 200 – 300’.

The vision of people within the district is to provide for the housing needs of their families and hopefully to improve the quality of life. The purpose of the plan should be to provide only enough housing for the natural growth for the needs of the population within the district in such a way that residents’ lives are enhanced. It should not encourage inward migration as it is impossible to realistically predict the full outcome, but it will almost certainly be detrimental to any hopes for the improvement in the quality of people’s lives.

The amount of housing proposed in the Draft Local Plan 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. It is clear that the sites are only in the local plan because they have been made available by landowners and developers under ‘the call for sites’, rather than being part of a clear and effective sustainable development strategy. This is to quote from a well known film a case of “*Build it and they will come*”. The result will be an increase in Urban Sprawl rather than a ‘Field of Dreams’.

Whilst the draft plan gives much consideration to where the council thinks housing should be built it contains almost no detailed information on the where, when and how the additional infrastructure will be funded. There is little about how the ‘Community Infrastructure Levy (CIL)’ will be implemented and how this can (or cannot) provide for the major infrastructure requirements to support the existing and expanding population. The ARUP evidence predicts “*the forecast capacity figures show that current infrastructure will be under significant pressure to accommodate the growing population*”. One would have expected that at this stage the draft would indicate more clearly how the infrastructure needs will be met. It is not acceptable that in discussions with EFDC ‘Forward Planning Team’ representatives that they keep saying it is a ‘Chicken & Egg’ situation; “*We need to decide exactly where the housing will be allocated before we can decide on the detailed infrastructure needs*”.

While we appreciate that the EFDC ‘Forward Planning Team’ has put in a lot of hard work in producing ‘**a plan document**’, and that it seems there have been both time and internal staff number constraints, unfortunately we can only conclude that ‘as presented’ this document is ‘Not fit for Purpose’ and does not meet EFDC’s ‘Vision’ or that of Local Residents.

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

Strongly Disagree

While the Council claim that their approach to housing distribution is the most appropriate for new housing, and will be sustainable and only result in “a limited release of Green Belt land”, it proposes large allocations of housing around all the main settlements in the district where land has been put forward by land owners and developers under the ‘call for sites’. This results in the Draft Plan being ‘Developer’ rather than being fully sustainable. Only with regard to Harlow has the strategy been to concentrate much of the future development on a major town. Towns offer the best prospects for sustainable development and greater effort should have been put into finding suitable sites.

Discounting the allocations suggested for the Major towns of Chipping Ongar, Epping, Harlow, Loughton and Waltham Abbey has still resulted in very large allocations (in many cases disproportionate to the present size of these large or small villages) to fifteen further ‘settlements’. This is far from a sustainable option and also results in the loss of Green Belt. EFDC seem to have taken a ‘New Approach’ to the concept of sustainable development with regard to Green Belt Boundaries and it is not in line with present government thinking. None of the evidence produced by EFDC supports their ‘New Approach’.

It is not logical to distribute housing allocation and other development around all of the settlements in the District. New development should be focussed on the towns in the District where Brownfield sites do exist (even if these have not yet been put forward) and where housing will benefit from existing good infrastructure and facilities. Towns have better existing transport links and are much better suited to provide additional associated development such as increased school capacity or larger doctor’s surgeries.

We have already suggested that housing needs are over stated (see our response to Q1) and EFDC should be pushing Central Government and London City Hall to take onboard the provision of more housing in central London that will lower the need for migration from the centre. Even more of the proposed development should be concentrated **within** Harlow which seems to accept that a large amount of growth would be beneficial. Increased housing could also be met by redevelopment of the less well built housing estates in the district and this could encompass higher densities and more affordable housing.

The sites in the local plan are only there because they have been made available following ‘the call for sites,’ by landowners and developers, rather than being part of a clear and effective sustainable development strategy. The incursions into the Green Belt have been ill-thought out, and there is no detailed justification for the disproportionate allocation of 360 new houses in and around Theydon Bois that would result in a 23% increase in the size of our forest village. The existence of the TFL station is not sufficient reason for this large allocation. (See responses to Q6 & 7).

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

Partially Agree but with reservations

While we believe it is more sustainable to focus development on towns, any approach that encroaches into the Green Belt to achieve this is not welcome.

We also have some concerns about the long term approach with regard to Harlow within the plan period and beyond 2033. The approach here by EFDC and other Councils would eventually seem to result in an intensification of the ‘London, Stansted, Cambridge Corridor’ along the M11 that may eventually result in an industrial and housing ‘urban radial’ extending all the way between London and Cambridge. It seems that the financial success of this ‘Core Area’ is being given priority over everything else and outweighing all other concerns. This seems to be a return to the discredited and finally abandoned ‘East of England Plan’ and would ultimately bring pressure to fill the gaps between Loughton Theydon Bois, Epping, North Weald, Harlow and beyond creating a disastrous ever widening ‘radial of Urban Sprawl’ through our villages and the Green Belt.

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 it **should be implemented so as not to undermine existing local facilities** that are found within the smaller settlements of the District.

Our Primary Shopping Areas already face strong competition from larger centres and the internet. EFDC’s approach that widely distributes the allocation of housing and employment sites will do nothing to assist our present Primary Shopping Areas. The strategy of the local plan should support the present and new Primary Shopping Areas by focusing housing and employment development within the towns. 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).

Strongly Disagree

New employment opportunities should be directed towards the sites where larger allocations of housing have been made. Preferably within or close to those towns in the District that wish to have employment opportunities expanded in a sustainable manner. While the restraints in 4.35 and draft policy E1B are to be welcomed as they help retain existing employment sites. It now appears ‘short sighted’ that a number of “employment sites” within towns have already been demolished in favour of more lucrative residential development.

While the NPPF promotes the sustainable growth of all types of businesses, in rural areas employment other than appropriate agricultural or leisure related should not be allowed on sites within the Green Belt as this is unlikely to be sustainable development and does not meet with the tenets of the NPPF.

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.

- No - Area - Theydon Bois

Theydon Bois is being poorly served by this second stage consultation. In the Issues and Options consultation document 3 sites A, B & C were proposed. These have all been rejected in favour of 5 entirely new housing sites plus an employment site in and around Theydon. While we are pleased that our own and others responses to the Issues and Options consultation may have helped to prove that the earlier sites are not viable we are now effectively back at consultation stage one. This means that after these responses from Theydon we will not be allowed a second opportunity to 'refine' our responses after seeing a more detailed appraisal by the EFDC Forward Planning Team as there is no further consultation opportunity before the Plan goes forward to Section 19. This puts Theydon interest groups and residents at a considerable disadvantage in comparison to many of the other areas where residents will have had an opportunity to critique the councils later draft proposals for their area.

Theydon Bois residents expect and do not disagree that a certain amount of house building should and will take place **within** our village, but this should be proportionate, just meet our own needs for expansion and be of appropriate density and design. While we acknowledge 'windfall site' builds of less than 6 units are not included for Local Plan purposes. It should be recognised that Theydon has completed in excess of 30 new builds since April 2011 including some that are above 'Windfall'. At least 10 new completions are expected before the end of 2017, including 8 that are above 'Windfall'. These new builds are largely meeting our own needs.

Five sites with a total of 360 homes have been allocated in and around Theydon Bois which is a disproportionate allocation that amounts to a 23% increase in the size of our village which would destroy our present character and therefore not comply with EFDC's 'Vision'. This would breach the traditional limitations on Theydon's natural growth and far exceeds Theydon's own needs for housing. Present and foreseeable infrastructure for Theydon cannot support this amount of rapid and uncontrolled growth.

A much clearer idea of Theydon Residents 'Vision' of our village and its future is contained in our Village Design Statement that was prepared with the guidance of the RCCE and is supported by the village wide questionnaire and other evidence.

<http://www.theydon.org.uk/VDS/VDS%20Downloads/TB%20Village%20Design%20Statement.pdf>

<http://www.theydon.org.uk/VDS/VDS%20Downloads/VDS%20addendum%20August%202015.pdf>

<http://www.theydon.org.uk/VDS/VDS%20Downloads/VDS%20Analysis%20Document%20PDF.pdf>

This document was submitted to EFDC, but despite repeated requests was disappointingly never adopted as a ‘Supplementary Planning Document’, Material Planning Consideration or as part of the evidence base for the new Local Plan. This is in stark contrast to many other LPA’s. As an example Braintree has approved 15 Village Design Statements as material planning considerations:

https://www.braintree.gov.uk/downloads/download/30/village_design_statements

Theydon Bois has registered and will soon start work on a Neighbourhood Plan, but the prescriptive site allocation and limited flexibility for local input does not bode well for this and although NP’s & VDS’s are referenced under DM9K again there may be a reluctance on the part of the Council to fully endorse them?

Four of the proposed 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 not located within the ‘main village envelope’ and / or have clearly definable boundaries that should not be breached. Breaching these definable boundaries will result in encroachment into the countryside and a loss of the fundamental openness to these areas that are essential if the rural character of our village is to be maintained. The Draft Local Plan does not contain any very special circumstances for these sites that clearly outweigh this harm, and therefore our Green Belt boundaries should not be altered as part of this local plan.

Appendix 5 for Theydon Bois shows very specific numbers for housing trajectories for each time period from 2018 – 2033, including zero builds from 2021 – 2026, yet there is no indication of how this staggered delivery is to be achieved or controlled. When we questioned Forward Planning Team members with regard to these figures the response was that this is the sort of delivery that they would predict from land owners and developers based on previous experience. In other words these ‘precise’ figures are pure guess work. Given the scale of this local plan, past experience cannot be used to predict what will happen in this case. The sites are only in the local plan because they have been put forward by landowners under ‘the call for sites’ and are being made available to developers by them. Without effective controls from the Council on housing delivery these developers will move forward with, and market first the sites that will give them the most profit. These will be the desirable green field sites such as those allocated in Theydon Bois. This will only encourage inward migration as developers market the housing widely to the buyers that will give them the most profitable and quickest returns. It will make a nonsense of any staggered delivery as development will take place where and when it is most profitable. This will do little to meet the housing needs of Theydon Bois and the District as intended in the Draft Plan.

There is also no indication of the number of housing units that will generate a ‘Master Plan’ for the delivery of infrastructure. Again the Forward Planning Team members questioned would not be tied down to a specific number, but it seems this will not be less than a 100 units? The impact of something in the region of 100 housing units developed quickly in a village of our size would have an enormous impact on infrastructure that cannot be met without a well thought-out ‘Master Plan’ already in place. This scale of development is quite possible given the lack of controls noted in the paragraph above.

The infrastructure in Theydon Bois is dependant not only on improvements within our own village, but is also related to development and infrastructure delivery elsewhere. Theydon Bois is effectively a satellite of Epping and to some extent Loughton with regard to many of our services and present infrastructure. Our small doctor's surgery is a sub unit of the Epping 'Limes' doctors practice. The Theydon Bois TfL station is further along the Central Line than the start in Epping which is served first. The proposal to build 1,640 homes in Epping will not only put an enormous strain on the infrastructure in Epping it will also have a considerable detrimental effect on the infrastructure in Theydon Bois. The needs of any housing developments in Epping must also consider the impact that their delivery will have on Theydon Bois.

Theydon's Infrastructure Problems that need careful consideration:

Health Care Provision - Our doctors' surgery is officially open for only four mornings a week to serve an increasingly elderly population. Unfortunately quite often it is closed at short notice and is rarely open for more than three mornings. As a sub unit of the Epping Limes practice the opening hours are fully dependant on the available doctors from that practice in Epping. Meetings have already taken place between our Parish Council, the 'Limes' and village residents. It is clear that this and other doctor's practices are already unable to cope with the demand and this can only get worse with population growth. With a present population of approximately 4,000 Theydon already justifies a full time doctor's surgery? 360 new homes would increase our population by at least a further 1,000 people. Funding for more doctors is dependant on population numbers, but it would seem that the population growth will have happened before the needs are met. The Nuffield Trust indicates there has been hardly any increase in the numbers of GP Doctors in England since 2004. It is therefore highly unlikely that our health care needs can be met. We find it incredible that the ARUP report claims the The Limes Medical Centre has capacity for a 50% increase in patients. Try telling this to residents that are at present waiting in excess of three weeks for an appointment. This figure needs to be independently assessed.

Public transport – The bus service is hourly Monday to Saturday and two hourly on Sundays. The Underground trains are so overcrowded at rush hour by the time they arrive from Epping that passengers have been known to go east to Epping first just to get a seat! TfL have told ARUP (who have used this as the basis of their report) that for *“the five stations at the end of the Central Line in Epping Forest District, peak hour capacity is around 37% utilised”*. They also predict that extra demand from increased housing numbers would only amount to 3%. We do not know what 'peak hour' window TfL have used to arrive at these conclusions, but frankly we find them unbelievable and they need independent checking. ARUP also state *“TfL have stated that there are capacity issues further down the line during peak hours and discussions about the implications of growth in Epping Forest District are ongoing with TfL”*. It seems there is a conflict here but no clear plan. TfL have been told to maximise the income from all the land within their ownership including its use for house building. This fact may be having an influence upon their present stance towards capacity which seems to have now changed from the recent past.

Roads – All are signposted as unsuitable for heavy traffic. Of the four roads into the village one has a 7'6" width restriction, two are narrow and winding and the fourth, the only modern road, built in the 1930s as part of an aborted London outer ring road, has a listed,

restricted bridge at the entrance to Abridge. Traffic through the village has increased substantially over the last few years and we are plagued with commuter parking problems. Many of these commuters at present come from around Harlow to access our station and the cheaper TfL fares. This situation is likely to get worse following the proposed housing developments around Harlow.

Electricity Supply – The load caused by the demands of the plethora of modern appliances has put a strain on the system which has caused a pavement fire at the corner of Avenue Road and power cuts to the shops in Coppice Row. Many sections of the village already experience power cuts two or three times every month and residents have received apologies from some of the supply companies. Recently houses have received a letter giving details of who to telephone when the supply fails. In the last two years several sections of cable have been replaced piecemeal in Coppice Row and Station Approach.

Water Supply – Low pressure at the top of Coppice Row has at times caused the Water Company to supply residents with bottled water.

Sewers – Much of the original system installed in the late 19th Century is still in place, and with the increase in houses and modern appliances so water dependent, at times it fails to cope. A number of blockages have occurred and as recently as this year Poplar Road was closed for remedial work. The system is thought to cross the fields to the northeast of the village and drain into the sewage works beyond and adjacent to Hobbs Cross Golf Course. We believe this relatively small sewage works is close to capacity. The main outlet pipe from Theydon to the sewage works crosses the land beyond the railway proposed for development

Flooding - The centre of the village near the shops is at the lowest point and surface water flooding has been a perennial problem, at times making the zebra crossing impassable. In 1982 there was serious flooding in this part of Theydon Bois caused by rapid water run off from the higher land in the forest (see here: <http://www.theydon.org.uk/Flooding%20in%20Theydon%20Bois/default.htm>). House building in Forest Drive is likely to allow this to recur in times of high rainfall, which seem to be more common now.

School Places – The primary school, built in the 1960s, has been added to over the years as demand has increased and is now a group of rather ill matched classrooms that are running at or near capacity. The school is already reliant on a temporary demount-able building and has failed to attract funding from EFC for permanent, adequate classroom space. There is a need for additional secondary school places, several of the local secondary schools are already over subscribed.

Given the above it seems very doubtful that the infrastructure needs of Theydon Bois can be met if 360 homes are developed here.

Theydon Sites for Allocation:

SR-0228i Station Car Park and commercial yard.

Generally we have only a few concerns about development of this site. 29 homes would seem to be an appropriate high density development and consistent with other high density units comprised of flats in the immediate vicinity. We have some concern that a viable business will probably be lost (the Indian Restaurant), but recognise that this has only a short time to run on its lease from TfL. Any development would have to be designed so as to supply as a minimum the same number of station parking places as at present plus sufficient additional numbers for the 29 homes. We have doubts that such a site would be attractive to developers, especially if land was made available in the Green Belt on the other side of the railway.

SR-0228ii Station Car Park and commercial yard to the East of the railway.

We strongly object to any development on this Green Belt Land as it breaches the definable and defensible barrier of the railway line. Our argument with regard to all the developments to the East of the railway line **SR-0228ii, SR-0026B & SR-0026C** is set out below.

SR-0026B

We strongly object to any development on this Green Belt Land and it breaches the definable and defensible barrier of the railway line. Our argument with regard to all the developments to the East of the railway line **SR-0228ii, SR-0026B & SR-0026C** is set out below.

SR-0026C

We strongly object to any development on this Green Belt Land and it breaches the definable and defensible barrier of the railway line. Our argument with regard to all the developments to the East of the railway line **SR-0228ii, SR-0026B & SR-0026C** is set out below.

SR-0070 Land at Forest Drive.

We object to development on this Green Belt land unless very special circumstances can be shown. This is again a site within the Green Belt and is recognised as one of high value. The Sustainability Appraisal states the approach to the Green Belt sites will protect the most high value sites from development. Case Law has concluded that housing numbers alone are not classed as very special circumstance for development in the Green Belt. It is important that the alternative spatial option of "*intensification within the existing settlement - (that) provides opportunities to maximise urban Brownfield land*" should be considered first.

The proposed 52 homes together with parking spaces is a very high density development for this site and we doubt that this density could be achieved with normal housing of an acceptable design. If development was allowed here it is crucially important that the clearly defined boundary within the Green Belt site of the Crystal Brook Watercourse is not breached and no development is allowed in the rising landscape beyond.

The Theydon Bois tree wardens in conjunction with EFDC Country Care have identified 2 extremely rare Elm trees that appear resistant to Dutch Elm Disease on this site. These trees could be of national importance. They have discussed with EFDC's Tree Officers the possibilities of TPO orders on them. Such a high density development as proposed here

could effect the viability of the important trees. If TPO's are granted this would reduce the available area for development

We are concerned that as the only viable access to this site will be via Forest Drive and the multiple road junctions at Station Approach and Coppice Row that there would be severe traffic congestion and noise problems. Already there is congestion here. If a development was considered it should ideally be one of Sheltered, Assisted or Dependant Living homes that will have little or no parking requirement. This would allow space for a still high density but sympathetic design. This is a much needed facility within Theydon and the District given our aging population. Because of the desire and need for this type of special accommodation it may amount to 'special circumstances'.

SR-0552 Blunts Farm Motorway Compound (Possible Employment Site).

Given its remote Green Belt location and lack of public transport this site can only be accessed by vehicles using the protected Coopersale Lane. This is not a sustainable future employment site and can probably only be used for its present function were access is allowed from the motorway.

Our greatest concerns relate to the land to the east of the railway line and, if this is released from the Green Belt, the potential harm to the village now and in the future, particularly as there would no longer be a clear and well defined physical boundary to the Green Belt. We strongly object to any development on Green Belt land to the East of the Railway line.

The three sites East of the railway line identified above and on Figure 5.17 of the plan document are:

1. SR-0026B (land East of Central Line/North of Abridge Road, including the Old Foresters Site) – approximately 133 homes;
2. SR-0026C (part of the Thrifts Hall Farm, Abridge Road) – approximately 121 homes;
3. SR-0228ii (Theydon Bois London Underground Car Park, and commercial yard adjacent to Theydon Bois Station, to east of Central Line) – approximately 19 homes.

The NPPF states that *“The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”*

Paragraph 80 sets out the five purposes of the Green Belt which are:

To check the unrestricted sprawl of large built up areas;
“To prevent neighbouring towns merging into one another;
To assist in safeguarding the countryside from encroachment;
To preserve the setting and special character of historic towns; and
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land”.

Paragraph 83 is clear that a Green Belt boundary should only be altered in *“exceptional circumstances, through the preparation or review of the Local Plan”*. It also states that such a review *“should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period”*

Paragraph 85 sets out considerations for the local planning authority when defining boundaries and these include:

They must “*satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and define boundaries clearly, using physical features that are readily recognisable and likely to be permanent*”.

Figure 5.17 of the plan document shows a quite specific somewhat curved ‘dashed’ outline to the East of the railway line that encompasses the three sites SR-0026B, SR-0026C & SR-0228ii. There are no clearly definable boundaries along this line. It is just a line across the field that has no justification. The next clearly definable boundary once the railway line is breached is the M11 motorway and that is a considerable distance further into the Green Belt. When the Forward Planning Team members were questioned regarding the reasoning behind this specific outline and justification for it as a proposed site boundary the only thing forthcoming was that it would allow the number of homes (273). It was further suggested that a definable boundary could be ‘built’ such as growing a hedge. To think this would form a definable and defensible boundary is frankly ludicrous.

The Council has attempted to use very special circumstances to overcome the identifiable harm that would be caused to the Green Belt if these sites were developed. However, this has relied on weak planning judgment and they have been very general in their approach and not addressed the site specific circumstances of these sites. (See also our response to Q1) Therefore we consider that the stated very special circumstances do not clearly outweigh the significant and substantial harm that will be done to the Green Belt and will not *preserve the special setting and character* of our village.

The Council’s ‘Vision for Theydon Bois’ is that “*Theydon Bois will continue to maintain its local feel and character and preserve its rural setting, adjacent to Epping Forest, while providing a mix of housing, key local services and high-quality independent retail. Theydon Bois will also enhance its leisure facilities and social infrastructure to support existing and future residents*”. It is clearly evident to us that if the proposals in the draft plan are adopted and 360 homes are built on the proposed sites then our rural setting will be destroyed and its present local feel and character will cease to exist. This ‘Vision’ will not be met.

7. Do you agree with the approach to infrastructure provision being proposed in the plan?(See Chapter 6).

Strongly Disagree

There does not appear to be any specific requirements for infrastructure, at best it is generalised and difficult to quantify as part of a new development. We would expect much more detailed assessments of the infrastructure needed at this stage, especially with regard to Q6 Theydon Bois, where we have been returned to ‘stage one’ as the original sites in Issues & Options’ have all been rejected in favour of 5 entirely new sites

There are no provisions to ensure that the infrastructure needed will be provided in the right place at the right time. Without effective controls from the Council on the timing of housing delivery the infrastructure needs will not keep pace with housing development.

The infrastructure requirements seem only to deal with the need arising from the new development and this in itself will do little to solve the existing problems and shortfalls.

There is little about how the ‘Community Infrastructure Levy (CIL)’ will be implemented and how this can (or cannot) provide for the major infrastructure requirements to support the existing and expanding population. Secure funding, timing, capacity and specific types of required infrastructure should be assured before development is allowed to proceed.

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 Sustainability Appraisal 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 (and that is how those in Theydon Bois are rated), then contradicts itself by stating high quality Green Belt land will be lost (this would be true for Theydon Bois).

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. We therefore do not accept that high quality Green Belt land should be undermined by the Sustainability Appraisal, and indeed such high quality Green Belt land provides essential value that enhances the quality of lives within our district, now and into the future.

The Interim Sustainability Appraisal does not support the wide dispersal of development in and around the large and small villages of the District. Such wide dispersal will perform badly with regard to sustainability as the large and small villages identified for housing development will still have to rely on the larger settlements for a wide range of facilities.

In respect of Theydon Bois, the Sustainability Appraisal sets out the basis of assessing sites in the Green Belt “to enable sufficient sites to be considered to maximise existing sustainable transport links within the settlement”. The transport links are already at capacity (we do not accept the ARUP opinion – See our Q6 Response) and our underground station is poorly served by the existing road network and bus services. 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 and exacerbate Theydon’s already difficult commuter parking problem.

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

While we accept that there is no need to repeat the guidance of the NPPF, the local plan is a strategic document that should be able to provide clarity, certainty and understanding to developers, residents and community groups alike through the inclusion of detailed development management policies.

The draft policies are severely lacking in detail, for example Green Belt policies (SP5) amount to little more than a page. How do the Council intend to approach redevelopment of

previously developed land in the Green Belt? How do the Council define disproportionate extensions to properties in the Green Belt, or direct what is meant by ‘materially larger’. The Brentwood Draft Local Plan for example has been very specific on this;

<http://www.brentwood.gov.uk/pdf/08022016165904u.pdf> (Page 140)

The detail in the present EFDC Local Plan provides at least some better guidance than this draft and in the past this detail has allowed the Council and / or the Planning Inspectorate to better judge the appropriateness of any Planning Applications or Appeals before them.

While draft policy (SP6) talks about “*policy to manage and prevent harm to landscape character*” it would benefit further from policies that seek to promote the excellent work carried out by EFDC Countrycare to improve and enhance the rural landscape and protected Green Belt land. We would like to see some specific reference to Quiet Lanes and Protected Lanes (such as Coopersale Lane) under this policy.

Many of the important Landscape Character and Ancient Landscape policies (LL1, LL2 LL3) seem to have been lost.

As noted in our responses above Theydon Bois and other places with or near stations have a considerable commuter parking problem. There is a lack of detail in Draft Policy T1 Sustainable Transport Choices policies on Car Park provision and retention and on residential areas and off street parking.

What is required is a detailed and consistent approach from the Council at District level with greater clarity regarding such policies as those above or on design and the infrastructure. This should ensure that the local character of villages such as Theydon Bois is maintained or improved.

We have viewed a number of other LPA’s Local or Draft Local Plans and with respect to drafting new policies most have taken the NPPF as a starting point and gone on to provide greater detail and clarity with their own policies than those contained in EFDC’s Draft Local Plan.