



February 2019

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The Epping Society

**Part 2, for Matters raised by the Inspector, numbered 5,6,8,16
Submitted by Thursday 21 February 2019 by The Epping Society**

The following summaries are offered as an introduction to the responses of The Epping Society to the SVLP. It is our intention to have the Society represented at all of the hearings, where we would hope to explain our views, ask questions etc.

MATTER 5: Site Selection Methodology (Issues 1-3) and the Viability of Site Allocations

Issue 1: Have the Plan's housing allocations been chosen on the basis of a robust assessment process?

Hearing statement points

- i. Epping Society are concerned that the rationale for the original pool of sites was inconsistent, relying on a Call for Sites; and that insufficient attention was paid to maximising the use of areas other than Metropolitan Green Belt. We feel that the reasons for deselecting some sites were skimpily explained and inconsistent.
- ii. We consider that reliance only on calls for sites is an inappropriate method for site selection as it excludes principles of town planning and may result in a sub-optimal pool of potential locations for development.
- iii. There is great local concern about the proposals to use car parks for housing – parking is already at a crisis across the District.
- iv. By allocating high numbers of additional housing to places with access to a commuter rail line, such as Epping, existing parking problems in the town will become intolerable for retailers and residents.
- v. Attempts to dissuade commuters from residential streets have transferred the problem to the next roads. Before exacerbating the problem still further by developing to the north of the town alternative means must be introduced of getting commuters to the station. Perhaps by a park-and-ride at NWB with an effective bus or light tram service to Epping station or further down the line.

Issue 2: Have the Plan's allocations for Gypsies and Travellers and Travelling Showpeople been chosen on the basis of a robust assessment process?

Issue 3: Have the Plan's new employment allocations been chosen on the basis of a robust assessment process?

Hearing statement points

We consider that insufficient weighting has been given to putting new employment sites within sustainable reach of homes. We are against converting any existing employment site now within walking distance of housing and public transport to housing as is proposed in Epping.

Issue 4: At the broad strategic level, are the Plan's allocations financially viable?

Hearing statement points

- i. The Plan asks a lot of developers, and should be more specific about how and when contributions will be expected.

The Epping Society

EFDC Local Plan Inspection – Hearing Statements, 2019

- ii. We recommend that smaller sites should be excluded from a number of obligations and/or their contribution should be a fixed determinate financial one to avoid the costly investigation and uncertainty attendant on meeting the policies as written. Such uncertainty might deter potential smaller developers.

MATTER 6: Housing Supply, including Sources of Supply; the Housing Trajectory; and the Five Year Supply.

Issue 1: Will the Plan provide a land supply sufficient to deliver the housing requirement of at least 11,400 dwellings over the Plan period?

Issue 2: Will the Plan ensure that there is a reasonable prospect of a five-year land supply being achieved upon adoption and throughout the lifetime of the Plan as required by paragraph 47 of the NPPF?

Hearing statement points

- i. Epping Society would have wished to see a clear, easily-understood statement of housing numbers, densities and the planned trajectories, reconciling the mismatches between Neighbourhood Plans and the Local Plan. This would have made public consultation more approachable, and in future it would be useful for developers and would clarify the matters for residents.
- ii. We would also question whether the District Council have examined an alternative provision through increasing densities in some existing housing areas.
- iii. We believe effective monitoring and accountability can only be achieved if rolling requirements and achievements are available openly and on a [quarterly] basis showing, for example, required housing numbers by type and community, affordable housing and infrastructure delivery.

Issue 3: Does the Plan meet the requirements of paragraph 10 of the Planning Policy for Traveller Sites (PPTS) in respect of delivery?

MATTER 8: Garden Town Communities

Issue 1: What is the “Garden Town” concept as applied to proposed allocations SP5.1, SP5.2 and SP5.3 and is this significant for plan- making purposes?

Issue 2: Are the Garden Town allocations deliverable in respect of their impact on transport infrastructure?

Issue 3: Are the criteria in Policy SP4 (historic environment) justified, effective and consistent with national policy?

Issue 4: Are the site allocations (SP5.1 (Latton), SP5.2 (Water Lane) and SP5.3 (E. of Harlow)) in Policy SP5 sound and deliverable?

Hearing statement points

- i. Epping Society considers that for such significant developments, all aspects should have been fully planned for far enough in advance for effective consultation – items such as schools, the hospital and medical services, employment opportunities, drainage; while the impacts at local and District-wide levels had been assessed with mitigation planned.
- ii. The question at 6 (SP5.1 Latton Priory, access onto the B1393), begs the question of the existing level of congestion on that road and what it might become in future.
- iii. We challenge the publication date of the Gilston Master Plan dated June 2018 because we were unable to find any such document on the EFDC Planning Our Future website until January 2019. Despite being a respondent to various consultations our well-known society was not informed of this planning document.
- iv. The proposed developments around Harlow are not in any sense “Garden Towns” because they are not self-sustaining communities and would be more accurately described as commuter sprawl tacked-onto Harlow but theoretically part of EFDC,

The Epping Society

EFDC Local Plan Inspection – Hearing Statements, 2019

MATTER 16: Development Management Policies (DM1–DM22)

Issue1: Are the Development Management Policies in the Plan justified, effective and consistent with national policy in respect of the specific matters set out below? Are there any other issues concerning their soundness?

DM1 habitat and biodiversity

Hearing statement points

Epping Society considers that small developments should be excluded, and would hope to see a threshold proposed for consultation.

DM2 Epping Forest SAC and Lea Valley SPA

Hearing statement points

The lack of clarity here has led to proposals such as Epping South which abut Epping Forest. The Society also asks for greater clarity about how developers will be contributing, and would then prefer contributions to be used locally to each development (where appropriate) rather than put into eg a Forest “pool”. We consider that spending from such a pool would be opaque to residents and accordingly unaccountable and unrelated to the source of the funds.

DM3 Landscape

Hearing statement points

Epping Society believes that the assessments of sites (eg Arup) inadequately weighted this landscape factor; for instance the consideration of Epping Sports Centre (SR-0347) which would have been visible for up to 4 miles away to the North West.

DM4 Green Belt

Hearing statement points

- i. Epping Society supports a call for greater clarity on Metropolitan Green Belt protection.
- ii. Further, in relation to school sites, there are examples where EFDC has used school sites for “proxy housing” developments in the Metropolitan Green Belt (eg Epping St John’s School), which should not be repeated.
- iii. We would prefer to leave all existing Metropolitan Green Belt designated as such, and not reassign it to categories which might have a lower resistance to development. There is scanty local confidence in EFDC’s robustness to resist development pressure and we cite:
 - a. EFDC approval of an application to build 33 homes on the former Chimes Garden Centre in the Metropolitan Green Belt–reported in local Guardian newspaper week ended 21 December 2018;
 - b. Knolly’s Hill Nursery (EPF/1162/15) where development was approved for 79 homes;
 - c. 8 houses on the Green Belt were approved on Metropolitan Green Belt in November 2012 with the inappropriate justification that it would enable a private rugby club to improve its facilities. By application EPF/0917/18 Upper Clapton Rugby Club has sought an additional houses in similar circumstances.
 - d. and other developments in the Metropolitan Green Belt, seemingly in breach of Green Belt policies.

The Epping Society

EFDC Local Plan Inspection – Hearing Statements, 2019

DM5 Green and Blue infrastructure

Hearing statement points

- i. The policy as written appears to unwisely ban all future development in these areas and we feel there should be some contingency;
- ii. At least one of the traffic mitigations suggested at the junction of Ivy Chimney Road with Theydon Road will reduce the function of a “green corridor” so as to be not be viable for wildlife movement between areas of Metropolitan Green Belt and the supposed green corridors of South Epping;
- iii. Pedestrian access to the forest at what would become a busier, faster and wider road traffic junction would be seriously impaired at Theydon Road – B1393 junction. This would result in a restricted road crossing point which could effectively separate all of the forest north of that point from the bulk of it to the south;
- iv. There is a dedicated horse riding crossing at that point and it is well used by cyclists, which it would be difficult to sustain.
- v. The alternative access to the forest from Epping in this area would be across the junction on Theydon Road with Ivy Chimney Road, where traffic volumes may be expected to increase significantly if 950+ homes are to be built on the adjacent South Epping site. Indeed, IDP ref EPP28 refers to a £2-3mn scheme there as “desirable”: we consider that without that spend cars from 950+ homes

DM6 Open Spaces

Hearing statement points

- i. The need for open spaces was assessed as adequate for the existing population (EB703); but we have not seen an assessment of how the proposed large increase in housing and population will affect demand. We challenge the conclusion at EB703 table 6.1 (no page number) which states “The Epping settlement area has excellent access to Natural and Semi-Natural Greenspace, being bordered by Epping Forest to the north and west.”
- ii. The demand for sports pitches, etc was examined in EB711. Table 4.7 on page 75 appeared to calculate future need based on natural growth in population without allowance for additional demand from the thousands of additional new homes proposed. Could this be clarified please.
- iii. Built sports / leisure facilities is almost an incendiary local issue. The Epping Society believes that expanded facilities should be planned and located within existing settlements. This proposal addresses sustainability and accessibility, without which use and the health and leisure aspirations of sports facilities would not be achieved. We support the sentiment in the draft Local Plan, Ch 3 Objective D to “enhance existing and create new Sports facilities” but this has not been demonstrably delivered in the submission version which appears not to reflect the population growth it implies. As far back as 2012 the EFDC Open Space, Sports & Recreation Assessment said there was “outstanding need for additional facilities”.

DM7 Heritage assets

Hearing statement points

The Society would discourage replacement of nationally recognised protection, by “locally listed” categories – as has happened with Tree Preservation Orders. Local listing of buildings has not protected them from destruction and significant heritage assets have been lost in Epping.

The Epping Society

EFDC Local Plan Inspection – Hearing Statements, 2019

DM8 Heritage at risk

Hearing statement points

We would like this aspect enhanced; the Council has recently demonstrated an unwillingness to adequately control the development of local heritage, eg the Churchill pub in Debden, the Half Moon pub and Pearce’s bakery in Epping – the first two of which have been replaced by overwhelmingly inappropriate developments of excessive height and bulk.

DM9 High Quality design

Hearing statement points

- i. Epping Society found this policy to be poorly constructed, confusing and based too loosely on vague principles, many of which are subjective. For example, is there a District “distinctive character” or “historic environment” – eg Loughton and Waltham Abbey are very different.
- ii. If the Essex Design Guide is to be more than a reference footnote, the Plan should be subject to substantial modification and consultation and its application clarified.
- iii. We have a concern that all new homes be required to be uniformly and universally inclusive of occupant type, rather there should be heterogeneous developments to suit different types of residents.

DM10 Housing design and quality

Hearing statement points

- i. We found this policy lacked clarity and was difficult to respond to in consultation.
- ii. The Review Panel should have a role here, but it should be open to public membership and scrutiny to validate it.
- iii. A Review Panel should have the authority to initiate additional reports so that thematic design shortcomings and design issues on important sites can be addressed whatever their size.

A reference to such a body was mentioned in brief in the draft local plan (Draft Local Plan, Draft Policy DM 9 and paragraph 4.160 (EB123)) but there was no subsequent consultation and the public have had no opportunity to participate. The policy may well comply with National Policy and Guidance and be considered best practice by Design Council, RTPI, Landscape Institute and RIBA but it does not engage with the public and its remit is restricted to large scale housing and commercial developments only.

There was no indication in the draft plan that this important local role would be outsourced to a national commercial service provider. If such a proposal had been open to consultation The Epping Society (and no doubt others) would have vigorously protested.

- iv. The Local Plan refers to an existing review body but we understand there are two: one for Gilston, etc and one for the rest of the district. We have not been able to find minutes of meetings, a meeting timetable, agendas, or any opportunity for public participation in their deliberations, nor any budgets or costs incurred.

DM11 Waste recycling

Hearing statement points

- i. The Epping Society would like to see explicit reference made to the storage of recycling containers (wheeliebins), within all new build. This has not taken place at eg the Arboretum, spoiling an otherwise imaginative attempt at high density but pleasing design.

The Epping Society

EFDC Local Plan Inspection – Hearing Statements, 2019

- ii. We would also like to see an increase in Civic Amenity Points (“dumps”) – the nearest being in NW Harlow and nearly always long queues; to make recycling less inconvenient and more sustainable.

DM12 Basements

Hearing statement points

We question whether basements merit a special set of rules, can they not be controlled within EFDC standard planning policies, building control and noise regulations?

DM13 Adverts

Hearing statement points

Epping Society answer positively to both questions; but question whether a new policy is needed, or merely a more robust enforcement of the existing? We have made representations about the year-round proliferation of estate agents’ boards outside blocks of flats but there has been no response in the Local Plan.

DM14 Shopfronts

Hearing statement points

We would welcome more strict policy and enforcement here. EFDC has a patchy record, especially of permitting unsuitable glass-sheet front shop design in conservation areas and Primary Retail Frontage. We propose a style more suited to a market town which should be positively encouraged also for refurbishments which might not need planning approval. The Essex Design Guide does not address retail and commercial design (perhaps it should) while the QRPs are restricted only to large new-build projects.

DM15 Flood risk

Hearing statement points

Flood risk is a focus of community concern – firstly that areas locally-known to flood are listed as development sites (Roydon and Epping), despite professional assessments, secondly that the Council has repeatedly failed to insist on permeable surfaces on drives, front gardens and paved areas which increases run-off (eg The Half Moon pub large flats development which has no permeable surfaces and initially even concreted to the roots of a TPO tree).

DM16 SuDs

Hearing statement points

Has the Council evaluated the impact of developments on the systems of dendritic seasonal flows which are locally known to exist (eg in the gardens between Crows and Tower Roads)?

The policies should be tightened and enforcement practised with more enthusiasm. Flats were built on the Half Moon ancient pub site with no permeable surfaces at all.

DM17 Watercourses

Hearing statement points

Will the new policies be sufficiently robust to control building near watercourses, the Society has knowledge of at least 2 instances when extensions were permitted within feet of watercourses (Lower Swaines, Epping and High Road North Weald)?

The Epping Society

EFDC Local Plan Inspection – Hearing Statements, 2019

DM18 Water supply and waste

Hearing statement points

The Policy should permit exemptions for very small developments, where (subject to assessment) services can be “bolted on” to the existing.

DM19 Sustainable Water use

Hearing statement points

Epping Society would have preferred the Plan to do more than refer to the Code, but rather insist that at least some of the standards in the nine categories became requirements. In other words, go beyond the minimum. Large developments should be required to have a theme of meeting a higher level demand for eg renewable energy or grey-water recycling; let’s have at least one “ecovillage”!

DM20 Low carbon / renewables

Hearing statement points

- i. Heritage assets should be exemptable, upon reasonable application.
- ii. We feel that other opportunities have been missed here such as the provision of Electric Vehicle charging points required in all new large developments and compulsory spaces for bicycle storage (both issues of health, sustainability and transport modal shift).
- iii. The viability of larger scale plans (like district heating systems) depend to a large extent on technical issues and the design and density of new developments, ie issues to have been considered at the Master Plan stage, would now need a major modification?

DM21 Environmental impacts

Hearing statement points

Epping Society support this point.

DM22 Air Quality

Hearing statement points

- i. Air Quality is a significant local concern, not just in itself, but also as linked to the infrastructure / traffic situation as of now, and as projected in the Plan.
- ii. In terms of the District, traffic growth as modelled by EB502 cannot but carry a despairing outlook. Existing traffic levels are beyond capacity. Even with mitigations and the (we believe unrealistic) prognostications for modal shift, the growth anticipated in the Plan will be disastrous. With that situation the impact on air quality will be massively significant.
- iii. For the Bell Common AQMA, an EFDC Action Plan (May2012) proposed 6 measures, but to our non-technical view only 1 (a 40mph limit) has been implemented. However this benefit has been overwhelmed by increased pollution from the resultant idling traffic (Buckhurst Hill Parish Council, 28 Sept 2017).

A meeting in EFDC (11 Sept 2017) described the existing damage to the Forest from air pollution and there were several calls for other areas to be monitored, and a Councillor pointed out that when the M11 is shut (which happens several times a year) the B1393 “gridlocks” and pollution soars*.

It therefore seems extraordinary to propose 950+ homes on a site close to this AQMA and adjacent to the M25 Motorway and as close as 500 metres from the M11-M25 junction; as the principal route from Epping South onto the main road network is at Bell Common. Epping Society asks whether alternatives sites with a greater number of exit routes / not

The Epping Society

EFDC Local Plan Inspection – Hearing Statements, 2019

close to AQMA, motorway or Forest have been considered with sufficient weighting given to this factor?

*The matter of Contingency Planning for events such as motorway closure, airport crisis etc do not appear to have been considered in the Local Plan. Perhaps the Inspector might explore this topic? Certainly both the motorways in our District are shut (or overwhelmed, with drivers' SatNavs guiding them onto local roads through the District) sufficiently frequently for this to need planning for. This issue may be relevant to other Matters and Issues.

At a Council meeting 11 September 2017, Cllr Whitbread is reported to have said "when the M11 shuts, Epping is gridlocked, and air pollution must soar". We agree and recommend that such high levels of pollution should be avoided by limiting local population growth and effective contingency planning for traffic peaks before sites are approved for development.