

## **EPPING FOREST DISTRICT COUNCIL**

### **Local Plan: Submission Version 2017**

#### **Schedule of Comments and Objections**

##### **Housing**

The London boroughs neighbouring Epping Forest District, ie Havering, Redbridge, Waltham Forest and Enfield, are all expected to increase their housing numbers dramatically by the Replacement London Plan. This pressure adds to the demand in the Epping Forest District, arising from its proximity to London.

The Draft Epping Forest District Local Plan tells us that the District Council is aiming to provide 11,400 dwellings over the planned period 2011-2033. That equates to 480 pa.

Up until the end of March 2017, it had provided only 1,330 dwellings, approximately 220 pa. Therefore, the remaining 10,070 will need to be provided during the remaining Plan period. That equates to 630 pa. Even that is including 2017-2019 at that enhanced rate, which is unlikely to have been met.

The rate required to meet the Plan's target will now have to be increased to at least three times the current completions. It is difficult to see how this can be achieved without allowing developers considerable planning relaxation, perhaps on dubious sites in face of the Plan's policies and adverse impact on local communities. Many residents already feel that they have no say in the course of developments of all kinds, regardless of public consultations required by legislation. This arises in part from confidential pre-application meetings between planners and developers where the schemes are developed before the public gets to hear of them. Communities are already concluding that rather than resisting developers, they are fighting the planners. As one planner has commented 'Public consultation is a veneer for decisions already taken'. This chimes in with the view of many in the community.

## **Housing in Loughton**

Of the 11,400 dwellings required over the Plan period, more than 7,000 will be provided by homes already built or approved, by requirements of the Garden Town and by windfalls, leaving a little over 4,000 to be provided elsewhere in the District. It is dismaying that over 25% of these should be allocated to Loughton alone, in view of its restricted boundaries.

Loughton is contained by Epping Forest to the west and north, by Forest buffer land to the south and Roding Valley meadows and flood plain to the east. What limited amount of Green Belt that adjoins Loughton is essential to maintain green wedges separating it from neighbouring settlements of Theydon Bois, Chigwell and Buckhurst Hill. It is therefore unable to expand and can only accommodate so much housing by increasing its density, maybe to the extent of changing its character.

A core principle set out in the Plan notes that design policies are to concentrate on guiding the overall scale, density, mass, height, landscape, layout and access of new developments in relation to neighbouring buildings and the local area.

Housing in Loughton is primarily of 2-3 storey dwellings with a few 4 storey flats and this character should be respected if the principles set out in the Plan are to be at all meaningful. It would be appalling if the recently constructed Landmark House on Debden Broadway is taken as comparable for further developments. It was planned behind closed doors and built in the face of massive community objection which was treated by the planning authority with indifference and grew to 8 storeys, hitherto unknown in the town. It is of such bulk as to offend the skyline from any direction of approach. Aberrations like this should not be repeated.

Loughton's setting and proximity to the City makes it a very attractive place to live and as a consequence there is a strong on-going demand for housing, as opposed to need. For this reason, all obvious building sites are being or have been developed, leading to the proposals in the Plan to cram new dwellings on to essential parking sites, intensifying housing by destroying useful buildings and denying parking spaces to 70% of the proposed dwellings in the Plan. These proposals fly in the face of the Plan's own policies and appear to be based solely on achieving the numbers required, with little town planning consideration.

## **Policy LOU R1 Loughton Underground Station**

The site area is given as 1.62 hectares, to be developed at 114 dwellings pHa, resulting in 165 homes, yet realistically significantly less than 1.6 Ha will be available for development.

The site is of an extremely awkward shape. There is a bank of protected trees which cuts off a small part of the site and the entrance/exit to the Council/supermarket car park must be maintained. The Plan calls for the development to include ground floor level retail space on the station forecourt side, its servicing and the retention of the drop off/pick up parking spaces. Adjoining the site is a locally listed railway signal box whose setting must be respected and an existing public footpath which runs through the sight north to south-west, which must be maintained and enhanced.

An equal number of car parking spaces must be provided as exist in the present station car park, plus space for visitor parking, blue badge holders, car clubs and the servicing of the proposed development. Access must be provided sufficient to allow for emergency vehicles, particularly fire engines.

The reduction in the available area of the site for housing suggests that the number of dwellings called for the Draft Plan will lead to building to an unprecedented and unacceptable height, which would make nonsense of the design policies set out in the Plan.

## **Policy LOU R2 Debden Underground Station**

The site area is given as 1.66 Ha, to be developed at 129 dwellings pHa, resulting in 192 dwellings. The site is more regular than site LOU R1 but again much of the site will be take up with the station approach and a taxi rank. Also, it must provide an equal number of parking spaces as exist at present, together with visitor parking, blue badge holders, car clubs and the servicing of the proposed development. The foregoing will result in a dense development on the available land, perhaps of an unacceptable height, to achieve the number of dwellings stated;

## **Policy LOU R5 Jessel Green**

The Debden Estate of social housing was built in the 1950's by the then London County Council, centred on Debden underground station. It comprised

approaching 4,000 dwellings, of which 90% are 2 storey houses, the remainder in low rise flats. Included were shopping parades, schools, sites for churches, pubs, a library and health facilities, together with a business estate for commerce and industry. Also included were open green 'lungs' for the recreation of the community. The Estate was built to a density of a little under 12 dwellings per acre.

The largest green 'lung' is the well-loved Jessel Green, which is some 8.03 Ha (20 acres). The Plan proposes to develop 50% of the site for housing, which is an unacceptable loss to the community and flies in the face of proposals set out elsewhere in the Plan for the protection of open spaces and ignores the protests of the local community.

The demand for dwellings and the lack of appropriate sites may lead to some development of this site, in spite of the protests of the local community. If that is so the District Council should hold meaningful consultations with representatives of the local community, to agree the extent, type, design and tenure of the dwellings, but on a lesser area with a fewer number of dwellings than set out in the Plan, maintaining the open, low-rise character of the estate. Also, landscaping of the remaining green space should be agreed to suit social activities of the community, both formal and informal, as stated in the Plan (Policy DM6C).

Elsewhere in Loughton multiple dwellings are proposed crammed in to random sites where useful buildings are to be demolished to make way for intensive housing development, thereby increasing the density and altering the character of the area, in conflict with policies set out in the Plan.

For approximately 70% of the new dwellings in Loughton, no parking spaces are to be provided. This is unrealistic as many of the occupants of those dwellings will no doubt own cars. In dense city centres it is reasonable to expect few, if any, residents to own a car, when almost every facility required for city life is close by. It is unrealistic not to provide adequate parking in sub-urban areas where the lack of parking spaces will inevitably lead to more pressure on the highways.

For policies LOU R1, LOU R2 and LOU R5 detailed planning briefs should be prepared against which planning applications must be measured. This note probably applies to sites elsewhere in the District where the scale of development is contentious.

## Social Housing

The District Council has a lamentable record of providing social housing, yet there is considerable need. The Plan tells us that the number of affordable homes required for the Plan period is 2,851, which averages 178 pa. Statistics show that there were only 127 social dwellings completed in the years 2015-2018, which averages 42 pa, although shamefully not one was completed in 2016-2017.

The Plan calls for 40% of dwellings in future developments of over 11 dwellings to be affordable. Historically, the percentage of affordable dwellings required by the current Local Plan is seldom achieved because planning law allows for developers to claim that the scheme would be unviable to include them. The Draft Plan is peppered with the phrase 'subject to viability'.

The biggest variable in development is the site value, which is dependent upon location and the extent of development the planning authority will permit. Clearly, the requirement for social housing affects the site value. The developers pay top price in order to secure the sites, in the certain knowledge that they can reduce the numbers of social dwellings by arguing that it would upset the viability of the project. Thus, affordable housing and other contributions are squeezed out of the system. Development is therefore geared to the market sector, which fewer and fewer of the local residents can afford, particularly young, first time buyers. With those new dwellings available to the world-wide market, the result is an ever-increasing population in the District, without adequate provision for known local needs. Yet the Draft Plan states 'The provision of affordable dwellings is a key issue for the district'.

It is therefore essential that the viability test should be toughened up if private enterprise continues to be expected to provide a significant amount of social housing. The consequence of toughening up the viability test might depress site values, but such sites are most often open land, such as agricultural, playing fields, parks, large gardens, derelict commercial and brownfield sites, which are of modest value until they receive planning permission, when the value increases dramatically. As planning permissions are granted by the community, it is recognised that the community should enjoy part of the benefit arising from those decisions. The provision of affordable dwellings is a transparent way for it to do so.

Of particular importance is that the Council should adopt the policy that when releasing Council-owned sites for housing it should ensure that at least the full amount of social housing is provided, possibly by way of a covenant or other legal instrument which would survive the viability test brought under planning law.

In the past the Council has traded off social housing requirement for a financial deal, thereby letting down the most needy in the District. The prime example of this lies in the already mentioned Landmark House, built on the council-owned site of the much-loved Winston Churchill public house at the entrance to The Broadway in Debden. Planned behind closed doors and built in the very heart of an estate of social housing, it provided 64 flats for the open market, with not one social dwelling. No wonder many in the community are dismayed with the system.

The effect of not providing at very least the number of social dwellings required by the policies set out in the Plan leads unwittingly to a form of gerrymandering.

## **Garden Town**

It is noted that 16,100 dwellings are to be provided in the Harlow area, 955 of which will be in the proposed Harlow and Gilston Garden Town. Of the foregoing 3,900 dwellings will be in the Epping Forest District.

Although the principle of Garden Cities, as promoted by Ebenezer Howard in his books 'Tomorrow: A Peaceful Path to Reform' (1898) and 'Garden Cities of Tomorrow' may have been adapted to provide greater flexibility to suit contemporary lifestyle, as promoted by The Town and Country Planning Association, the principles set out by Howard should be followed to justify the garden town description. The Draft Plan attempts to meet those principles but shows little in how to achieve them.

Those principles include:

- Land value capture for the benefit of the community
- Strong leadership, vision and community engagement
- Community ownership of land and long-term stewardship of assets
- Mixed tenures of homes and housing types that are genuinely affordable

- Strong local jobs offer in the Garden City itself with a variety of employment opportunities within easy commuting distances of homes
- Development that enhances the natural environment
- Integrated and accessible transport systems
- Strong local cultural, recreational and shopping facilities in walkable neighbourhoods

To achieve Howard's concept means that the Garden Town would include all of the elements of the needs of a community, including housing, employment, retail, civic buildings, boulevards, transport, health, recreation, education, the arts and leisure facilities. The whole with agricultural land beyond, the intention being that the development should be as self-supporting as possible.

It is difficult to see how three disparate parcels of land, bolted on to Harlow, can be developed to create a Garden Town when it is to be overseen by three planning authorities and physically constructed by a number of commercial developers over many years, as the delivery period will, no doubt, extend beyond several electoral cycles.

It is particularly difficult to see how the principles of land value capture for the benefit of the community can be achieved, when the work will be executed by commercial developers seeking to harvest immediately the financial benefits of the project. Under the principles of garden cities such benefits should accrue to the development for maintenance and future stewardship of the community, not self-interest. It is also noted that infrastructure elements to be provided by the developer are 'subject to viability', with its known hazards.

The Harlow and Gilston Town Spatial Vision Consultation Draft appears to embrace many of the principles set out above, but is only aspirational and does little to show how it can be achieved. The early garden cities were designed by fine architects such as Unwin, Parker, Lutyens and de Soissons. The Vision states that 'buildings and places will be created working with leading and innovative architects'. Apart from being subjective, there can be little control over which architects developers care to employ, or even if they employ one at all. This item is symptomatic of a number of aspirations set out in the document which depend on outside agencies, not within the councils' control.

The Vision has little to say about car parking other than reference to limited parking for family homes, temporary parking zones and pick-up/drop-off

points, yet this is a very important element to be considered at an early stage in any major development.

Hopefully, the principles will be met in the development, sufficient to justify the title Garden Town and that, in spite of that status, it will not fall short. It would be sad for it to be embraced by Howard's sharp comment 'Familiarity with the term Garden City is not necessarily accompanied by an appreciation of either its meaning or significance'.

It is noted that the sites for much of the new developments, including the Harlow extensions, are in the Green Belt. This country has a large and growing population and imports half of its food supplies from countries which also have growing populations, who in turn are demanding more for themselves. As land in East Anglia is amongst the most fertile in the country, the demand upon it for development purposes should be kept to a minimum. Although this may not worry us currently, it is likely to impinge on future generations. Such consideration is what planning is supposed to be about.

The foregoing comments regarding policies set out in the Draft Local Plan for the Harlow and Gilston Garden Town and for the Green Belt are but optimistic observations. Comments are also made as to the public's perception of the planning process. However, the following Policies are inadequate for the reasons stated.

### **Policy H2 Affordable Housing**

This Policy is not effective as a similar policy in the outgoing Local Plan has failed. It has not been positively prepared as during the time since the Plan period began in 2011 and the present, it has shown that it is far short of meeting objectively assessed requirements set out in the Draft Plan.

### **Policy P2 Loughton**

The proposed number of dwellings required in Loughton by the Plan is not justified, for the reasons set out in the foregoing text. The Policy has not been positively prepared because the basis of the proposals has been to achieve arbitrary numbers of dwellings, with very little planning consideration.