

## Response to Epping Forest District's Draft Local Plan Consultation

Dear Planning Policy

Epping Upland Parish Council has very carefully considered the questionnaire for the consultation on the Epping Forest District's Draft Local Plan and related documents. The Council does not consider that the framework of the questionnaire, and thereby the probable answers, allows it to comment on behalf of its residents as it would wish. A planning policy should protect the parish's characteristics and be sustainable for several years. It is not considered that the impact on this parish is covered in the questionnaire ie the potential erosion of the Green Belt which would intrinsically alter the character of the area, the throughput of traffic to Epping and that new infrastructure could potentially require use of the Green Belt. On this basis I am instructed to respond to the consultation in writing and for expedience by email.

The comments of Epping Upland Parish Council on the Epping Forest Draft Local Plan are therefore contained in this email. The Council recognises the reason for the questionnaire and its approach and where possible comments are related to the questions.

1 The Parish of Epping Upland is an ancient landscape and unique in what it provides to Epping, Harlow and surrounding areas. When Harlow was developed the uniqueness of the Upland character was maintained when Harlow was cleverly designed to fit snugly into a 'bowl'. It is vital that this area continues to form a bridge between the two settlements of Epping and Harlow, and the lungs to both. It is a beautiful landscape and an important area for agriculture – an industry that is still vital nationally that we should not lose sight of. There are several ridge lines in the parish for example from Rye Hill to Parvills Farm, which are stunning. These are worth preserving as they are integral to the locality and one of the reasons that there are so many visitors/tourists to the area who traverse the criss-cross of footpaths. Furthermore there are a number of historic assets within the parish and surrounding area, for example the Roman Road that runs from Upland Road to Latton Priory and beyond, see Essex Historic Environment Record. Does the new draft policy DM 7 Heritage Assets deal with all of this as it is replacing several existing detailed policies?

2 Too great a development on the edges of the parish will impact significantly on traffic through the area eg pollution from fumes and noise, and the real threat to its use as an amenity to its inhabitants and visitors. Light pollution is regrettably becoming an increasing issue from surrounding large settlements eg Harlow and Waltham Abbey; the parish has a dark skies policy. The Epping Green and Epping Upland areas have already been greatly affected by extra traffic from Harlow as drivers seek to avoid more time consuming road layouts and use the B181 as a short cut to Epping and transport services, and an informal diversion for works on the M11 and M25; in effect it has already become a rat run. The same can be said of Rye Hill Road which is a rural road requiring constant repair and where accidents are increasing. The transport system would not be able to cope. Harlow should be further considered in view of its rail and traffic links eg M11 junction 7a. To a lesser degree some plans for other areas could almost mean that they coalesce as for example have Sheering and Sawbridgeworth. It is important that there is a sustainable division so that areas retain identity.

3 There are reservations about the definition of 'limited release of the Green Belt'. Protection of the Green Belt should be paramount in view of its purpose which is particularly defined in the NPPF (National Planning Policy Framework) as follows :-

- 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

The NPPF further states that “Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land” and ‘very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.”

The Green Belt’s release for development should therefore be as an absolute last resort. Not enough attention has been given to the use of brown field sites.

4 It is considered that there are sufficient retail outlets in Epping and the other town/district centres and additional outlets would only exacerbate existing parking issues. Many shops have closed and remain empty, some eventually being converted to residential use. There is a tendency in the centres for a plethora of shop types eg cafes/restaurants, barbers. Independent retailers can no longer afford to trade on the high street and the way that people shop has changed particularly with the popularity of internet shopping.

5 There is insufficient information to properly respond to the question on employment sites and development; it is noted that further detailed work is being undertaken and there is scant information as to the types of employment.

6 Commenting on infrastructure is not easy in the absence of planning proposals or applications. Do the draft policies encompass the infrastructure requirements for current housing which is already inadequate as well as taking account of new developments? If there is an increase in housing then there should be an increase in infrastructure eg schools and GPs, proportional to the housing increase.

What will be the impact of building on car parks and the level of upheaval and displacement while the development/new car park works are being carried out?

Commuters from Harlow already travel to Epping for the tube which would only increase.

7 The Interim Sustainability Appraisal document is not easily visible and had to be found with the assistance of EFDC. Its relationship to this consultation requires clarity. How many people are going to read and understand such a document? Why is it given such importance above any other document?

8 As there are 56 draft policies it is surprising that specific questions have only been asked on 21 policies, leaving the responders at whatever level to unravel and comment on the remaining policies, trawling through at least a 233 page document in an un-user friendly environment. The documents provided are far too complex and will not be read by most people; a theme picked up by residents at a public meeting. What would be the penalty for not complying with the policies? Currently it appears that in the majority of cases either no action is taken by the planning authority or there is a requirement to seek retrospective planning permission which is invariably granted. Why was there no Executive Summary or similar summary, or questions asked with the relevant narrative and information proximate?

It is recognised that the substantive documents have by their nature to be very comprehensive and that a tremendous amount of effort has gone into reaching this stage.