



**RESPONSE**

**TO**

**EPPING FOREST DISTRICT COUNCIL'S**

**DRAFT LOCAL PLAN**



**December 2016**

## INTRODUCTION

This response by Loughton Town Council reflects the views expressed by the public at the open meeting held on 17 November 2016, attended by over 200 residents.

The Council has also taken into account the comments from the numerous emails and letters sent to the Council during the six-week consultation period.

Councillors have sought the views of residents through their close connections with local groups, at their regular surgeries and in more informal settings.

We have provided as an appendix, a collation of the written comments provided by residents on post-it notes after the public meeting.



## LOUGHTON TOWN COUNCIL'S RESPONSE

The Draft Vision for the District (provided on page 30) states:

By 2033 Epping Forest District will be a place where:

- residents continue to enjoy a **good quality of life**;
- **new homes of an appropriate mix of sizes, types and tenures** to meet local needs have been provided and well integrated communities created;
- development **respects the attributes** of the different towns and villages;
- development needs will be met in the most **sustainable locations**;
- **Epping Forest** will be conserved and enhanced;
- the recreational aims of **Lee Valley Regional Park** are supported;
- a more **sustainable local economy** including tourism, aviation, research and development, (and) food production will be developed [sic];
- a **distinctive and attractive network** of town and village centres will have been maintained;
- **access** to places by public transport, walking and cycling will be promoted; and
- **significant residential development** will be located near Harlow to support the economic regeneration of the town.

Loughton Town Council supports the overall vision that the Draft Local Plan sets out for the District. However, this overall support is **strongly qualified** by a significant number of objections and concerns about the detailed policies which are set out in this response.

The Town Council is also concerned that the key results, as set out in the Local Development Framework Community Visioning Results report and included as part of the evidence base in the preparation of the Core Planning Strategy, appear to have been ignored.

This provided a clear high-level vision for Epping Forest district that was definitive and unambiguous. The key result and No 1 Priority for the District over the next 20 years (since incorporated into the Evidence Base) was:

- **To protect and enhance green spaces whilst encouraging the growth of local jobs and businesses.** [source: Report to the Cabinet LDF-020-2010/11, 7.2.11 p1]

The present iteration of the Local Plan draft, especially as it affects Loughton and Chigwell, is the very opposite of that high-level vision.

Reference is made to Issues and Options (2012), page 15, item 3.13 which provided the results of Community Visioning as follows:

- *Protection and enhancement of green spaces was the top priority for residents of Buckhurst Hill, Chigwell, Epping, Loughton, Nazeing, Theydon Bois and Waltham Abbey;*
- *It was the second priority (behind job opportunities) for Ongar residents;*
- *There was general agreement at workshops that there was a need to (i) protect the Green Belt but to consider alterations around settlements where appropriate; and (ii) retain green spaces within urban areas.*

Further reference is made to the first edition of the “Epping Forest Planning Our Future Information Bulletin” published on 18 August 2016 which says “At the heart of Epping Forest District’s Draft Local Plan is the feedback your residents have given to the Council.

Feedback showed that the top 3 priorities for the district over the next 20 years were:

- No 1 - Protecting and enhancing the green spaces
- No 2 - Encouraging the growth of local jobs and businesses
- No 3 - Providing facilities

The two key issues for Loughton and its residents are:

1. **URBAN INTENSIFICATION.** This would mean the loss of much valued green spaces and involve car park developments; opposition to this is a view unanimously expressed at the recent town meeting attended by over 200 residents. The strength of public opinion against development of a number of the proposed residential sites in Loughton is further evidenced by letters and emails from residents and the volume of traffic on local social media sites. (See the detailed responses to Draft Policy P 2 later in the document). The idea of Urban Intensification received no support at the Issues and Options stage, save for a single comment from one responder. The Town Council **strongly opposes any urban intensification** above the minor infilling envisaged in Issues and Options;

and

2. **INADEQUATE INFRASTRUCTURE PROVISION.** This Plan appears to use a broad brush approach with little or no vision or recognition of the current problems facing residents and the adverse effects of additional development across the district and particularly in Loughton. There is too much reliance on other agencies to deliver vital infrastructure improvements. These are agencies over which Epping Forest District Council has little or no control, and there is a deficit in overall infrastructure provision that any number of s106 agreements on individual sites cannot counteract. (See detailed responses to Draft Policies D 1 and D 2). The Town Council **therefore strongly opposes** any urban intensification unless adequate infrastructure is available before or at the same time as development.

## **LOSS OF GREEN SPACES**

The proposal to utilise the existing urban spaces in Loughton, (Sites SR-0356, SR-0358 and SR-0361) is contradictory to the majority of responses to the Issues and Options consultation regarding Green Belt and Landscape in which some 77% said not all relevant issues for the Green Belt and landscape had been identified. There was a large majority opposed to the principle of development in the Green Belt, particularly before all brownfield land is reused and concern about London sprawl and **suburbanisation of settlements in the south of the district**. A majority of respondents favoured development away from the Central Line in the two similar choices.

The supposed sequential test stated at Section 3.54 on page 38 is unsubstantiated and not supported by any national planning instructions. “Sites located on open space in towns” might be appropriate if referring to derelict or unused sites, but not to public open space, which in the opinion of this Council is of equal or higher amenity value than rural green belt sites.

**The Town Council therefore resolutely opposes development** on part or the whole of the three open spaces on the former LCC estate (SR-0356, SR-0358 and SR-0361) and provides the following evidence.

## Evidence:

The overwhelming planning evidence for this objection is contained in a number of recent reports and in evidence collected from local people.

1) Reference is made to **Section 171 of the NPPF** which says:

### **Health and well-being**

*171. Local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports, recreation and places of worship), including expected future changes, and any information about relevant barriers to improving health and well-being.*

2) The document published by **Essex County Council**, “**A profile of people living in Epping Forest, Organisational Intelligence**”, dated April 2016 provides evidence to support this objection. It states that

- i. the Loughton Broadway ward is an area with high deprivation and health inequalities;*
- ii. Loughton Broadway (23.2%) and Loughton Fairmead (22.0%) are two of the four wards in the District with a higher than average percentage of children living in low income families.*

In recent years a number of reports have been produced to highlight the value of green spaces. Given the details from the 2011 Census, this value will be higher for the Loughton wards of Broadway and Fairmead.

3) In 2013, the report ‘**Green Spaces: The Benefits for London**’ identified the following benefits that open spaces deliver:

- **Economic Benefits** – *green spaces result in cost savings for government related to health expenditure, can attract businesses to locate and can encourage tourism;*
- **Health and Well-being** – *green spaces can play a role in promoting healthy lifestyles, reducing stress and preventing illness;*
- **Social Inclusion, community development** – *green spaces give people the chance to participate in design, management and care of local spaces, fostering local pride. They are places to socialise, and because access is free, provide an affordable alternative to other leisure activities as well as allowing children to develop socialisation and motor skills through play;*
- **Education and Lifelong Learning** – *green spaces provide an outdoor classroom for schools, and provide work experience and learning opportunities in environmental management;*
- **Environment and Ecology** – *green spaces help counter pollution, cool the air, increase biodiversity and provide wildlife corridors, serve as ‘lungs’ for towns and cities, absorb noise, and lessen rainwater runoff;*
- **Heritage & Culture** – *green spaces are part of the heritage and culture of local communities. They provide venues for local festivals and civic celebrations.*

Green spaces must be located within easy reach of the communities they serve. Five minutes’ walk would be considered easy reach. To say that Epping Forest is in easy reach of communities in the Debden Estate is unrealistic.

4) **Natural England Commissioned Report NECR067, Green space access, green space use, physical activity and overweight** published in April 2011.

The conclusion of this report reads:

*This study has provided new evidence that good access to urban green spaces is associated with higher use, higher physical activity levels, and a lower likelihood of being overweight or obese. Informal physical activity is an important component of overall activity levels, and provision of facilities such as green spaces which can be used for a wide range of physical activities, has population wide benefits. It is important that supportive environments are available to facilitate active lifestyles, and our findings suggest that green spaces may provide a valuable resource in urban areas. See <http://publications.naturalengland.org.uk/publication/40017>*

5) **The Parliamentary Office of Science and Technology issued in October 2016, a POSTnote no 538 on Green Space and Health.** The key points include:

- Physical and mental illnesses associated with sedentary urban lifestyles are an increasing economic and social cost.
- Areas with more accessible green space are associated with better mental and physical health.
- The risk of mortality caused by cardiovascular disease is lower in residential areas that have higher levels of 'greenness'.
- There is evidence that exposure to nature could be used as part of the treatment for some conditions.
- There are challenges to providing green spaces, such as how to make parks easily accessible and how to fund both their creation and maintenance.

See <http://researchbriefings.parliament.uk/ResearchBriefing/Summary/POST-PN-0538>

6) **Public Health England Health Equity Evidence Review 8:**

**Local action on health inequalities: Improving access to green spaces** published in September 2014 provides further evidence on the value of green spaces and the health benefits. It refers to the importance of accessibility and the impact on health.

See

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/357411/Review8\\_Green\\_spaces\\_health\\_inequalities.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/357411/Review8_Green_spaces_health_inequalities.pdf)

7) **The Land Trust: The Value of Our Green Spaces** published in January 2016 believes high quality well maintained green space is good for everyone and as a land owner and management charity, we know that it:

- supports the natural environment and enhances biodiversity
- provides opportunities for people to improve their health and wellbeing
- provides educational opportunities
- contributes to uplifting the economic value of communities
- encourages community cohesion.

<http://thelandtrust.org.uk/wp-content/uploads/2016/01/The-Value-of-our-Green-Spaces-January-2016.pdf>

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## COMMENTS ON SPECIFIC POLICIES

### Draft Policy D 1, Delivery of Infrastructure

Paragraph 6.10 on page 186 states “*The council will be reviewing the potential that a Community Infrastructure Levy (CIL) could make on supporting the delivery between now and the submission of the Plan.*”

- EFDC should adopt a more detailed CIL policy with specific levels and purposes clearly laid out.

**Transport 1: The Central Line** – the proposed number of additional dwellings for Loughton would likely result in 500 plus additional passengers per day.

- There are known constraints which restrict the ability of TfL to increase capacity:
  - a) the size of the carriages cannot be increased given the dimensions of the tunnels;
  - b) the number of carriages cannot be increased owing to the platform lengths in central London.
  - c) The frequency of trains cannot be increased because of the signalling system.
  - d) The fare structure attracts additional passengers from distant areas, which means that trains are crowded soon after departure from their terminus, and peak passengers cannot board in Loughton or points south.
  - e) The contention that there is spare capacity on the Central Line contained in the AECOM SA report (last para on p10) is so grotesque as to be risible. There is of course capacity within Epping Forest at off-peak times, but at times the public needs to travel, trains are full when they leave the Epping Forest boundary, and the chances of boarding at stations in Redbridge and Waltham Forest are low. Boarding figures for each train are necessary before this statement, made without evidence, is incorporated into the Plan.

### Transport 2: Roads

- There are only three crossings of the Roding and only one in Loughton, Roding Lane (Buckhurst Hill) the A1168 (Loughton) and Abridge (Lambourne). This constraint on the road network means that bottlenecks quickly build up, especially as the Forest imposes a straitjacket on the western side. Extra development in Loughton to what was envisaged in Issues and Options would merely overload an already impossible situation.

**Draft Policy P 1 Epping (page 121) and Draft Policy P 8 Epping Theydon Bois (page 158)** developments sites in these areas will add to the Central Line capacity problems.

- There will be more pressure on the service not only locally but further down the line, from Leytonstone through to the city.
- Developments planned by the London Borough of Redbridge in its Local Plan for sites in the Hainault and Aldborough Hatch areas will attract significant additional passengers on this underground line impacting on capacity for the whole line; as will the urban intensification of Wanstead, Woodford and adjacent London boroughs.

**Draft Policy D 2, Essential Facilities and Services** (education and emergency services)

- **Schools** – this is a demographic time bomb – the current expansion of primary schools in Loughton will impact on the existing secondary schools within 5 years. The only significant space for a new school was protected by a covenant for education/health use, which EFDC gave up.

- **Doctors' surgeries** – evidence from practice managers confirms these are already oversubscribed in the Loughton area with unacceptable delays for patients seeking appointments.
- **Emergency services** – the impact of restrictions and service cuts, particularly in the police service, is of great concern to residents.

### **Draft Policy D 3 – Utilities**

The impact of additional development on utilities particularly water supply, waste water and sewage treatment, needs to be quantified in advance of the site allocations – relying on “*developers to fund and complete appropriate improvements prior to occupation*” is unrealistic particularly where small scale development sites are proposed.

### **Draft Policy D 4 – Community, Leisure and Cultural Facilities**

*Development proposals will be permitted where they:*

- i. Retain and maintain existing facilities which are valued by the community;*
- ii. Improve the quality and capacity of facilities valued by the community*

The proposed sites SR-0356, SR-0358 and SR-0361 are essential to the wellbeing of the local community. Any development on these sites will be contrary to and undermine this draft policy. See the earlier evidence on the value of local green spaces provided in this document.

### **Draft Policy D 6 – Neighbourhood Planning**

The Town Council supports this policy. Having designated the whole of the Loughton parish as a Neighbourhood, it has delayed the preparation of a NP pending the publication of the draft Local Plan fully appreciating that the NP must complement the full Plan.

### **Draft Policy D 7 – Monitoring and Enforcement**

This is viewed as essential work which should be properly funded by the District Council.

NPPF section 207 recognises that effective enforcement is important as a means of maintaining public confidence in the planning system.

### **Draft Policy DM 2 – Landscape character and ancient landscapes**

Section A of this policy states “*Development proposals will be permitted where applicants are able to demonstrate that the proposal will not, directly or indirectly, cause significant harm to landscape character or the nature and physical appearance of ancient landscapes.*”

This should also apply to land previously designated as Urban Open Space, a view supported by the evidence from the views of the community at the Loughton public meeting.

### **Draft Policy DM 3 – Epping Forest SAC and the Lee Valley SPA**

This should include reference to forest edges where any development immediately adjacent to the forest would be inappropriate as it would bring an abrupt change of landscape.



## **Draft Policy DM 4 – Suitable Accessible Natural Green Space and Corridors**

*Providing appropriate SANGSC will involve:*

- i) providing new green spaces;*
- ii) improving access to green spaces;*
- iii) improving the naturalness of green spaces;*
- iv) improving connectivity between green spaces.*

There is a direct contradiction here with the green sites scheduled for development in Loughton in Draft Policy P 2.

SR-0358 (Sandford Avenue/Westall Road Amenity Open Space) and SR-0361 (Colebrook Lane/Jessel Drive Amenity Open Space) are existing greens of a size suitable for the communities they serve and any attempt to reduce their size could not be supported by evidence.

## **Draft Policy DM 5 Green Infrastructure: Design of Development**

The Town Council supports this policy but asks for:

Ai) to include reference to the specific retention of all significant trees, not only those already protected by tree preservation orders (TPOs); and

Aiii) New developments, which are landlocked and only accessible by car, are to be avoided.

**Key Evidence** (page 85) refers to the Ongar Community Tree Strategy in isolation. This surely must be an omission and fails to recognise the other completed community tree strategies, namely Loughton, Roydon, Stapleford Abbots and Theydon Bois.

EFDC should as part of further assessment work, undertake an audit of the existing employment land to consider whether some of these are suitable for reassignment as housing land – Draft Policy E 1 – Employment Sites.

Loughton Town Council supports the view of its residents that sufficient affordable and starter housing must be provided by the Plan.

Viability constraints – critical assessment could be used by developers as a means of avoiding the need to provide affordable housing on small development sites. The Town Council recommends that the level of units per site should be set lower – say by reducing the target from 15 to 10 dwellings and the 40% level of affordable properties per site must be strictly enforced.

## **Draft Policy DM 6 – Designated and undesignated open spaces**

The Town Council proposed the following amendment to **item A**.

*Where appropriate development proposals will be ~~expected~~ **required** to provide open space, or links to open space in accordance with the standards (currently being developed).*

Regarding **item B**. The total loss of open space is entirely unacceptable. The following amendment is required:

*Development on open spaces (including those allocated in this plan) will only be permitted if it does not result in the ~~total~~ **substantial** loss of usable public open space overall.*

The National Planning Policy Framework (NPPF) states at paragraph 76:

*“Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as **Local Green Space** local communities will be able to rule out new development other than in*

*very special circumstances..... Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the plan period”.*

EFDC is formally asked to recognise the value of these green spaces (**SR-0358** and **SR-0361**) to Loughton residents and rather than sacrifice these existing urban open spaces take this opportunity to reclassify them as Local Green Spaces so that generations more may enjoy the benefits. Alternatively they could be dedicated as Fields in Trust.

#### **Draft Policy DM 7 – Heritage Assets**

**Item Eii)** should include reference to “prior to commencement of development” and that the developer is required to fund the archaeological works.

**Item F–Non designated heritage assets including the Local List** refers to “*The conservation of locally listed heritage assets and other non-designated assets*”. There is an omission here as the policy should include explicit provision for the designation of areas and buildings of Townscape Merit, as recommended in the Heritage Asset review commissioned by EFDC and part of the evidence base. This can be adopted and put into force with the support of the parish and town councils. This section should also refer to regular reviews of the Local List, Conservation Areas, and Areas of Townscape Merit.

The reference to “*the Council seeks to retain buildings....*” in line 5 must be strengthened.

Reference to the use of Article 4 directions to remove certain national permitted development rights (see NPPF section 200) is required.

#### **Draft Policy DM 9 – High Quality Design**

##### **Design Standards item F.**

Add the highlighted text:

*Development proposals must relate positively **and in conformity** to their locality, having regard to: i) building heights; “...**and must not exceed the norm for the area.**”* noting that Loughton is a low rise town.

The Town Council proposes that there should be a maximum of four storeys in town centres and three storeys elsewhere. This is particularly applicable to the proposed site, SR-0226 and SR-0227, the two station car parks in Loughton. We ask for a new policy explicitly stating this.

**Item F iv)** *rhythm of any neighbouring **properties** or local regular plot and building widths and ~~where appropriate~~ **wherever possible**, following existing building lines;*

Much clearer guidance is needed to prevent town cramming:

**Privacy and amenity item J i)** Changes required- omit "where required" to read:

- J. Development proposals must take account of the privacy and amenity of the development’s users and neighbours. The Council will expect proposals that:
  - i) provide adequate sunlight, daylight and open aspects (including private amenity space ~~where required~~) to all parts of the development and adjacent buildings and land;

**Policy DM9 K – Design Principles** – an amendment is required in this paragraph to add, specifically, the Essex Design Guide, latest edition.

## **Draft policy DM 10 – Housing Design and Quality.**

The Town Council **requires** the following amendments in the revised Plan:

**Item A.** *All new housing development must be of a high quality, taking account of the privacy and amenity of neighbouring neighbours* (See Policy DM 9);

**Item B** Ground floor family housing must provide access to private garden/amenity space, and family housing on upper floors should have access to a balcony and/or terrace, subject to acceptable amenity, privacy and design considerations, or to shared communal amenity space and children’s play space **within the development;**

Alternatively, it may be clearer to omit item B entirely and substitute the present DBE8 (private amenity space) and add new paragraph "**Adjacency to a public amenity space will not supplant the need for sufficient and usable private amenity space.**"

**Item C.** The highlighted amendment is requested:

*Development proposals—~~should~~ **must** seek to include enhanced provision of green infrastructure, including the quantity and quality of landscaped areas, tree provision and, where the site allows, the provision of additional open space as required by Policy DM 5 and DM 6;*

To avoid over intensification, the Town Council requests the inclusion of the wording of existing Policy DBE8 which states:

New residential developments will be expected to provide private amenity space. This will usually:

- i. be at the rear of dwellings or flats;
- ii. be directly adjacent to and easily accessible from the relevant buildings;
- iii. be of a size, shape and nature which enables reasonable use;
- iv. have an aspect which ensures that reasonable parts receive sunlight throughout the year.

**DM10 – a new paragraph is required** specifically to include terracing effect:

**"Side extensions will be permitted only when such extension does not create a new terracing effect or exacerbate an existing one (e.g. making two short terraces into one long one). A gap of at least one metre will be required in such cases."**

Recognising the effectiveness of existing policies in the Local Plan (1998) and Alterations (2006) the town council also suggests that **the following two policies need to be included:**

*DBE2 – Effect on Neighbouring Properties*

*Planning permission will not be granted for new buildings which have a detrimental effect upon existing neighbouring or surrounding properties in either amenity or functional terms."*

*DBE9 – The Council will require that a change or intensification of use, extension or new development does not result in an excessive loss of amenity for neighbouring properties. The factors which will be taken into account are:*

- i. *visual impact;*
- ii. *overlooking;*
- iii. *loss of daylight/sunlight; and*
- iv. *noise, smell or other disturbance.*

**Draft Policy DM 11 – Waste recycling facilities on new development. We seek changes as below:**

**Item B.** Delete reference to multi storey as follows: *Proposals for new ~~multi-storey~~ flatted / ~~multi-occupancy~~ residential development will be required to make provision for:*

- i) Adequate temporary storage space within each flat, allowing for separate storage of recyclable materials;*
- ii) Adequate communal storage for waste, including separate storage for recyclables pending its collection.*

**Draft Policy DM 14 – Shopfronts and on street dining**

**Item Bii)** *provide sufficient space to not obstruct the pavement space.* **Add:** Any use of the public highway must be licensed.

**Draft Policy DM 15 – Managing and Reducing Flood Risk**

Re the proposed development of sites **SR-0226** (Loughton London Underground Car Park), **SR-0227** (Debden London Underground Car Park), **SR-0356** (Borders Lane Playing Fields), **SR-0358** (Sandford Road/Westall Road Amenity Open Space) and **SR-0361** (Colebrook Lane/Jessel Drive Open Amenity Space):

Development on all these sites will have a significant effect on the water table, will disturb spring lines, and will increase surface water run-off into neighbouring residential streets.

There are particular concerns regarding site SR-0356 which currently acts as a soakaway for a wide area. The additional run-off following development of this site can be calculated using publicly-available web tools such as <http://www.calctool.org/CALC/other/default/rainfall> and show that building on the 4.45 hectare site, given an average rainfall in the county of Essex of 667mm per year, an additional 29,681 tonnes of rainwater runoff per year will flow into Colson Road, Ladyfields and beyond.

Attention is also drawn to the Preliminary Flood Risk Assessment (PFRA) for this area published in January 2011 by Essex County Council as this document has identified the Loughton Area as a Tier 1 at risk area.

**Draft Policy DM 16 – Sustainable Drainage Systems**

This should include reference to mitigating factors such as green roofs and tree and hedge planting.

**Draft Policy E1**

The Plan is **defective** in that it proposes no means of assessing whether present employment land should not be converted to residential, where it is in a particularly sustainable location.

In 2012, as part of its response to the Strategic Housing Land Availability Assessment (SHLAA) and Call for Sites, the Town Council formally proposed the conversion of the former Bridge Farm (Clinton) site of approximately 3 acres adjacent to Debden station to residential. No action was taken on this proposal, so the Council has now resolved to draw its resolution to the attention of the site owner.

**Draft Policy E4**

The Plan should allocate a site for hotel (or shared hotel/residential) accommodation in Loughton, preferably close to a station.

## Draft Policy P 2 Loughton Page 127

### A. Residential and Employment sites

*In accordance with Policy SP 2 the following sites are allocated for residential development:*

- i) **SR-0226** (Loughton London Underground Car Park) – approximately 114 homes; and*
- ii) **SR-0227** (Debden London Underground Car Park and land adjacent to station) – approximately 193 homes;*

- Should these two sites proceed, there will undoubtedly be major disruption to local traders during the construction phase – some mitigation should be allowed for in this regard.
- In consideration of draft policy SP 1, Sustainable Development, the suggestion that the residents of the new properties at these two sites “won’t need cars” and that “in theory there will be no net loss of parking spaces” is totally unrealistic.

With particular regard to *i) **SR-0226** (Loughton London Underground Car Park)* concerns have been raised by residents about:

- the potential effect of underground construction in this area on the water table and the implications for the existing nearby residential roads; and
- the restricted access to the car park area.

iii) **SR-0289** (Vere Road) – approximately 10 homes; No comment.

iv) **SR-0356** (Borders Lane Playing Fields) – approximately 304 homes;

- Given the longstanding formal undertaking for this site to provide a sports centre on this site it will be impossible to deliver 304 dwellings at reasonable density, height, and massing.
- Residents have raised concerns about the increase in traffic on Borders Lane and local school capacity issues (see also previous comments on Policy D 2).
- This site has been neglected for many years and has as a result become of environmental importance for wildlife. Development here would be contrary to Draft Policy DM 1 Habitat protection and improving biodiversity.
- Responses from 14 residents in nearby Colson Road and Ladyfields when asked to provide evidence for the potential registration of this site as a village green showed the land has been used since the late 1940s for informal recreation. This open space therefore contributes significantly to the health and wellbeing of the local community.
- This site may be required to deliver additional educational facilities for the town. Such uses could be made largely commensurate with its status as urban open space.

v) **SR-0358** (Sandford Avenue/Westall Road Amenity Open Space) – approximately 53 homes;

- This is a well-used green for informal leisure activities valued greatly by the local community it serves, also more familiarly known as Rochford Green.
- There is currently an application lodged with the Registration Authority, Essex County Council, to designate this site as a village green. Sufficient evidence has been provided to justify this but the application is still pending as of 29 November 2016. We believe the *Barkas* judgement may not be held to apply to the Loughton sites.

- Evidence provided by residents as part of the application process confirms this green has been in constant use since the early 1950s for a wide range of informal leisure activities.
- vi) **SR-0361** (Colebrook Lane/Jessel Drive Amenity Open Space) – approximately 195 homes;
- As with site SR-0358, this is also a well-used green for informal leisure activities valued greatly by the local community it serves, also more familiarly known as Jessel Green.
  - Similarly, this site has a village green application lodged with Essex County Council but still pending. Sufficient evidence has been provided to justify this but the application is still pending as of 29 November 2016. We believe the *Barkas* judgement (*Barkas v North Yorkshire County Council* [2014] UKSC 31) may not be held to apply to the SR-0358 and SR-0361 Loughton sites.
  - Evidence provided by residents as part of the application process confirms this green has been in constant use since the early 1950s for a wide range of informal leisure activities. There have also been a number of successful and well-attended large scale community events on this green in recent years. It is one of the only easily accessible green spaces suitable for such community events in the town and any loss of this amenity would have a detrimental effect on the residents it serves. This effect is supported by the evidence provided earlier in the document on the benefits of green spaces in general and the appropriateness of the size of the greens.
  - No evidence whatsoever has been produced to support any contention that any of the greens are underused. This contention appears at the foot of page 12 (para: Land and Waste) of the AECOM Interim SA report, Sept 2016, which as supplementary evidence to the Local Plan, Loughton Town Council **considers is inadmissible**.
- vii) **SR-0526** (Golden Lion public house, Newmans Lane) – approximately 30 homes; no comment.
- viii) **SR-0527** (Royal Oak public house, Forest Road) – approximately 14 homes;
- EPF/2042/16 for this site has been refused by Area Plans South at the meeting on 23 November 2016, exception being taken to the high density of development. A smaller development was mentioned in the Way Forward.
- ix) **SR-0548** (Loughton Resource Centre, Torrington Drive) – approximately 35 homes;
- This is contrary to Draft Policy D 4 – Community, Leisure and Cultural Facilities which requires existing facilities valued by the community to be retained or enhanced. Alternative community provision will be required in the vicinity to replace the loss of this facility. The Thomas More church site might be available for this purpose.
- x) **SR-0565** (Loughton Library and adjacent Car Park) – approximately 44 homes;
- The description of this site should be amended to read ‘Traps Hill Car Park,’ to avoid confusion. This point was covered at the public exhibition at the Lopping Hall by a post-it note, which must be incorporated into the Plan.
  - The Loughton Library building must be safeguarded.
  - As with **SR-0226 and SR-0227** should development at this site proceed,
    - there will undoubtedly be major disruption to local traders during the construction phase. This disruption will also impact on the public attending

the nearby doctor's surgery, the shops and the play area – much mitigation should be allowed for in this regard.

- In consideration of draft policy SP 1, Sustainable Development, the suggestion that the residents of the new properties at this site “won't need cars” and that “in theory there will be no net loss of parking spaces” is totally unrealistic.
- The hilly nature of this site means that any building on it would be unduly dominant to neighbouring houses in Tycehurst Hill, Traps Hill, and area.

xi) **SR-0834** (Former Post Office depot and associated car parking, west of High Road) – approximately 30 homes;

- NB: A development for this site providing 30 dwellings has already been considered and refused planning permission – see EPF/1545/16. The refusal reasons cited NPPF policies. A smaller development was mentioned in the Way Forward, and the Town Council suggests 20 be the maximum target for this site.

xii) **SR-0835** (Old Epping Forest College Site, Borders Lane) – approximately 158 homes;

- This site may be required to deliver additional educational facilities for the town.

xiii) **SR-0878** (46 - 48 Station Road) – approximately 12 homes – no comment.

xiv) **SR-0325** (land north of the Bank of England works)

The Town Council strongly objects to this site being zoned for any development, as it breaks a natural green belt boundary, the Pyrles Brook (sometimes known as the Debden Brook), and would impair the value of the Broadfield Shaw ancient woodland, to which it is adjacent.

xv) **SR0355A** (north) – Former Britannia Sports Ground.

The Town council considers this land should either be zoned as residential, or offered as a swap for the Bridge Farm site, or for hotel facilities (see comment on E1 and E4 above).

xvi) **SR0355A** (south) – land behind Langston Rd Retail Park.

This might also be a site for hotel accommodation.

## **B. Infrastructure requirements**

Add the highlighted text:

*Infrastructure requirements must be delivered at a rate and scale to meet the needs that arise from the proposed development and allow for additional capacity requirements on the Central Line, in accordance with the Infrastructure Delivery Plan.*

## **C. Town Centre uses and D. Small District Centre Uses**

Reference is made to Draft Policy E 2, H Out of Centre uses, iii) and iv) and the Vision for Loughton and key strengths and weaknesses detailed on page 125:

- Whether the Broadway town centre boundary should be extended to include Langston Road with the soon to be completed retail park and, if so, how, given the separation of the two areas, has yet to be fully evaluated.
- Whilst on page 131 the alternative option to extend the boundary appears to have been discounted, the Town Council asks for a commitment to review this extension once the retail park has become established to ensure the impact of this 'out of centre' retail park on both The Broadway and the High Road is minimised.

- The percentage restrictions have already been breached in many areas of Primary Retail Frontage and require rigorous enforcement. The policy should state explicitly how enhanced enforcement is to be achieved.

### **Housing, Economic and Transport Policies**

**Housing** - General – additional policies are required to

- Introduce a local preference scheme; and
- prevent 'part-time' occupation

### **Draft Policy E 1 – Employment Sites –**

**Existing Employment Sites A.** *The Council will seek to retain and where necessary enhance existing employment sites and premises. Proposals for the redevelopment, renewal or extension of existing employment sites and premises for their designated use will be encouraged.*

### ***The policy needs to be qualified thus***

- An evaluation of the existing and proposed employment sites should be undertaken to explore opportunities for mixed use sites and /or conversion to residential.

### **Draft Policy T 1: Sustainable Transport Choices**

General – The Town Council is of the view that the majority of local bus services are sub-standard with service levels reducing. There is a pressing need for a Quality Bus Partnership Scheme between ECC and the bus operators to the north and east of Loughton in line with Government policy; see <https://www.gov.uk/government/publications/2010-to-2015-government-policy-local-transport/2010-to-2015-government-policy-local-transport>

In recognition of the existing problems with commuter parking on residential roads in Loughton, the Town Council proposes an additional **policy T 3**: to control on-street parking. Developers should make sufficient parking provision within each site according to the Essex Parking Standards and residents of new developments should not have access to residents parking zones. Where a development is likely to cause parking stress at a moderate or high level, in an area not fully covered by CPZs the developer will be expected to contribute to the costs of a CPZ.

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## GENERAL COMMENTS

**The proposed urban intensification of Loughton cannot be achieved without a serious adverse effect on the local community.**

Epping Forest District Council does not appear to have fully explored an option for one or more garden villages. This is a strategic mistake. A settlement in the north-east of the district or elsewhere should be considered. Basildon, Braintree, Brentwood, Colchester, Uttlesford, and Tendring Districts are actively investigating this option. That EFDC has not done so throws unnecessary burdens on the south of the District, and in the Town Council's opinion, the lack of evidence in this respect makes the Plan unsound.

The Town Council supports in principle the submission and evaluation of the Roding Village proposal, a new garden village on the site of the Woolston Manor Golf Course, [in Chigwell parish but close to Debden station] whilst noting that the site is in the Green Belt and partially within a flood zone. With careful planning this could be made sustainable, especially by direct cycle and pedestrian access into Debden station. It does not lie between the settlements of Loughton and Chigwell Village and is therefore not in a strategic separation gap.

**Draft Policy SP 3 – Strategic Allocations around Harlow** – the potential for development around Harlow should be maximised. Evidence available to the Town Council suggests that the Latton and Riddings sites, in particular, could take approximately a thousand more dwellings.

### **Draft Policy P 5 – Buckhurst Hill**

A. Residential sites

i) SR-0176 (St Just, Powell Road) – approximately 30 homes;

- This site is considered important for the separation of Buckhurst Hill from Loughton.

### **Draft Policy P7 – Chigwell**

The urban intensification of the Limes Farm Estate (SR-0557) is subject to the same objections as of the three Loughton open spaces, and cannot be justified.

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## CONCLUSION

The Town Council and its residents acknowledge the pressure that the District Council is under to provide additional housing. However, this Council believes that this document provides sufficient evidence to show that the proposals put forward for the Loughton area are unsustainable.

Noting that the housing allocation in the Draft Plan provides an overcapacity for the District, we invite the District Council to review those for Loughton as a priority.



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