

Epping Forest District Council Representations to the Draft Local Plan Consultation 2016 (Regulation 18)

Stakeholder ID 3340 Name LOUGHTON RESIDENTS ASSOCIATION

Method Email

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Letter or Email Response:

LOUGHTON RESIDENTS ASSOCIATION To: Epping Forest District Council We STRONGLY OBJECT to the draft Local Plan, except where clearly stated below. We hope that you will be able to take our comments into account, and to revise the draft Local Plan accordingly. Organisation Loughton Residents Association

About Loughton Residents Association Loughton Residents Association is a very active group of local residents who care for Loughton and its environment. Our membership is around 1,000 households, and we have been in existence for over 30 years. We are independent of any political party. We seek, and listen to, the views and concerns of Loughton residents and take action in support. We have a majority of the councillors on the Loughton Town Council, and councillors on Epping Forest District Council & Essex County Council. We have our own regular printed and email newsletters to residents and our own website, www.loughtonresidents.org.uk

Para/ page COMMENTS 1.4 Page 8 Page 30 OVERVIEW In 1.4 (page 8) the draft states "This Draft Local Plan includes the draft policies that the Council considers to be the most suitable way to develop the District in the future and explains other options it has considered and decided not to take forward together with the reasons for those decisions." We submit that the council has failed to set out a suitable way to develop the District, and has failed to set out a sufficient set of real alternatives for consideration. It has also failed to carry through the Vision and Objectives to the details of the Plan. i. Failure to respect the Community Choices consultation. The overarching priority of the Community Choices consultation was definite and unambiguous. The key result and No 1 Priority (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] Instead we find that green spaces in Loughton have been scheduled for development! We deal with this in detail below. ii. Failure to carry out the Vision into the Plan details. The Vision (page 30) includes "residents continue to enjoy a good quality of life; • development respects the attributes of the different towns and villages;" However, the draft Local Plan, especially as it affects Loughton and Chigwell, is the very opposite of this high-level Vision. We give specific instances of this below. iii. Failure to consult on genuine alternatives We contend that in a number of significant areas the Council has wholly failed to explain what other options it has considered and decided not to take forward (and has not given its reasons for those decisions). Indeed, where alternative options are provided in the draft, they appear to have been designed to "channel" responses towards the Council's desired conclusions, rather than to

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set out genuine alternatives. We give specific instances of this below. iv. Questionnaire designed to restrict responses – Consultation exercise inadequate a. The Questionnaire itself does not provide for detailed comments on particular aspects of the Plan, but asks respondents to state agreement, or otherwise, and to “explain your choice”. This is therefore not a “Consultation” but largely a set of “take-it-or-leave-it” questions. b. We attempted to provide our comments in the format laid down by the Questionnaire, but found it impossible to do so. In our view this raises further serious doubts about the adequacy of the Consultation exercise. Page 31

SPECIFIC POINTS Draft Plan Objectives We note that these include: “• to ensure that the design, density, layout and landscaping of new development is sensitive to the character of the surrounding area, is of a high quality and is designed so as to reduce opportunities for crime and anti-social behaviour; and • to ensure new development takes full account of, and mitigates where necessary, potential problems from air pollution, land contamination and noise.” Failure to carry Objectives and Priorities through to Policies We have given comments below on specific instances where the Council has failed to carry the Vision and Objectives through to particular Policies (reference to section below in brackets): · Priority 3 (3.54; Page 38) · Priorities 4 and 5 (3.54; page 38)) · Priorities 4-6 & Policy SP2 (Page 40) · Policy SP4 (3.79; Page 45) We would have expected that there would have been a detailed analysis of the Objectives, Priorities and Policies to ensure that they were wholly consistent, but this does not appear to have been carried out. 3.54 Page 38 Point (i) Source of hierarchy of development priorities? There is no external justification for the sequential approach adopted, which appears to have been developed by the Council itself. 3.54 Page 38 Point (ii) Priority 3 (“open space”) inadequately defined. Priority 3 states that “Sites located on open space within settlements where such selection would maintain adequate open space provision within the settlement”, but has no definition of what is meant by “adequate” open space within a settlement. “Settlement” is used to refer to separate towns and villages; these vary greatly in size across the District. Priority 3 would therefore have very different implications for say a small village and for a sizeable town like Loughton, which is itself made up of several different sub-settlements. Whereas it may well be reasonable to consider open space across the whole of a small village when determining what is meant by “adequate”, it would obviously be unreasonable to regard an open space at say the south-west corner of Loughton as having any relevance to residents in the north-east corner of the Debden estate. In order for Priority 3 to be applied in practice without ambiguity, the Council therefore needs to define “adequate” in terms of the open space available for use in practice to particular groups of residents. “Adequacy” must consider the needs of the general population, and also the needs of specific sub-groups such as (a) elderly residents and parents with small children, and (b) residents without personal transport available (these two categories will of course overlap to some degree). 3.54 Page 38 Point (iii) Priorities 4 & 5 (Green Belt) We note that, in the absence of land falling within the Council’s self-appointed Priorities 1-3, the Council’s chosen priority hierarchy requires them to consider developments in the Green Belt. However, the Council has failed to state whether it has consider a new village development (we note that other Essex councils have done so in preparing their Local Plans). Nor has it given any justification for omitting this as a serious alternative to its proposals. As a result, it has failed to consider its potential effect on the housing requirements for the rest of District. The Plan is therefore unsound. Similarly, we consider that the Council has failed to consider or justify a greater intensification of development around Harlow (see 3.65-3.70; Page 42 below), which again calls into question the soundness of the Plan and the adequacy of the Consultation 3.61 Page 39

Infrastructure We note that “The delivery of key infrastructure will be vital to support the number of homes and jobs needed”. However, the draft fails to provide a robust method of ensuring that this happens. Page 40

Draft Policy SP2: Spatial development Strategy We consider the draft Strategy to be significantly inadequate because it fails to consider the use of sites in accordance with the Council’s own Priorities 4-6. 3.64 Page 41

Alternative Options – Housing The alternatives considered relate solely to housing numbers and not to the strategy for identifying housing sites and the use of the Council’s invented “sequential approach”. 3.65 – 3.70 Page 42

Draft Strategic allocations around Harlow. We consider that inadequate account has been taken of the possibility of putting more housing here, particularly to the east of Harlow, in view of the transport link provided by Harlow station, and the availability of existing nearby infrastructure. Some of the sites, including Riddings and Latton, are capable of offering significantly more development without detriment, which would reduce the pressure for housing on the rest of the District. The Council has not included this as an alternative, which calls into question the soundness of the Plan and the adequacy of the Consultation 3.79 Page 45

Draft Policy SP 4 Place Shaping Strategy i. The draft Strategy fails to reflect the Draft Plan Objectives set out on

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page 31. This seems to be a fundamental omission, which strikes at the heart of whether the draft Plan is fit for purpose. The Objectives include: “ • to ensure that the design, density, layout and landscaping of new development is sensitive to the character of the surrounding area, is of a high quality and is designed so as to reduce opportunities for crime and anti-social behaviour; and • to ensure new development takes full account of, and mitigates where necessary, potential problems from air pollution, land contamination and noise.” However, the draft Policy does not provide for the “design, density, layout and landscaping of new development” to be “sensitive to the character of the surrounding area”. Instead, the draft Policy provides for an “ability to maintain and enhance the important features, character and assets of existing settlements”. This is a much vaguer description, which would place a much less specific requirement on developers and would facilitate Urban intensification, which has never before been suggested in the development of the Plan. See also below - Page 97 Policy DM 10 new paragraph G It therefore appears that the draft Policy is not fit for purpose and needs amendment. Parking. Given the pressure on parking space in Loughton, we suggest that the Strategy should include a requirement that development proposals should be designed to include sufficient parking to avoid creating any increase in parking stress on nearby roads. 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 should be expected to contribute to the costs of a CPZ. 3.80-3.93 Page 46 SP 5 - Green Belt and District Open Land There is a “Preferred Approach” but no alternative proposal to consider - see our comments above on pages 8 and 40. In particular, the Council has failed to state whether it has considered a new village development (we do not believe it has given this proper consideration) or to give any justification for omitting this as a serious alternative to its proposals. This calls into question the soundness of the Plan and the adequacy of the Consultation 3.96 Page 50 District Open Land. We quote this paragraph in full, as it is very relevant to later points. We note that the Council has placed two areas in this category but has completely failed to consider whether other areas within the District fall within this category, such as Sandford Avenue/Westall Road Amenity Open Space (also known as “Rochford Green”) and Colebrook Lane/Jessel Drive Amenity Open Space (also known as “Jessel Green” “3.96 The NPPF (paragraph 77) requires the following tests are met in order to designate Local Green Space: • where the green space is in reasonably close proximity to the community it serves; • where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and • where the green space concerned is local in character and is not an extensive tract of land.” This is an example of a failure by the Council to carry through the Vision and Objectives to the detail of the Plan. Page 50 Draft Policy SP 5 Green Belt and District Open Land See our comments above on page 8 and 3.54 - this is another instance where the alternative options are designed to “channel” responses towards the Council’s desired conclusion, rather than setting out genuine alternatives. 4.44-4.51 Page 66 We support draft Policy E2. In particular, we welcome the retention of the limits on non-retail frontage in the main shopping centres. i. We are aware that recent Government changes to planning policies have made it more difficult for the Council to resist changes between Use Classes, but we consider that these aspects may change again over the life of the Local Plan, and that it is very important to retain these aspects of the Policy in case this happens. ii. However, we understand that the non-retail proportion in the High Road Primary Retail frontage is already over 30% - we consider that the Policy should deal with this aspect by adding in draft Policy P 2, to maintain the retail level as specified (70% or 30%) or, where the level is already below 70% or 30%, to maintain it at that lower level. 4.73-4.89 Page 72 Draft Policy T 1 Sustainable Transport Policy. Loughton is served by the Central Line Underground Railway. A significant number of Loughton residents commute into London. We note that more than half of the District’s projected growth over the period of the Plan relates to migration into the District from London. However, we understand that at peak periods the Central Line is already running at capacity (or above). Options for increasing capacity are limited by the gaps needed between trains and the lengths of the platforms. Commuter from the two Loughton stations already face considerable difficulties in boarding trains at morning peak periods. The projected developments in Loughton and in the settlements to the north-east will have the inevitable effect of increasing the pressure on the Central Line. Draft Policy D 1: Delivery of Infrastructure, which provides for planning permission only to be granted “where the infrastructure and services required to meet the needs of the new development and/or mitigate the impact of the new development is either already in place or will be provided to an agreed timescale.” Despite the Council’s good intentions, we cannot see how the necessary extra Central Line capacity can be provided, which means that the draft Plan fails the NPPF requirement that it be “realistic” (and see 6.3 below) Page 95 Policy DM9A

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Draft Plan fails to meet draft Plan Objective B Draft Plan Objective B (page 31) includes requirements for new developments relating to “All new development must achieve a high specification of design and contribute to the distinctive character and amenity of the local area. The Council will require design-led development proposals which meet the following criteria: i) relate positively to its context to create a harmonious whole; ii) make a positive contribution to a place, improving the character and quality of an area;” We contend that the Council has signally failed to observe this Objective and that development of the sites on which we comment below will not and cannot “relate positively to [their]context to create a harmonious whole; ii) make a positive contribution to a place, improving the character and quality of an area;”

Page 95 Policy DM9J Private Amenity Space. In Policy DM9J(i) the requirement for private amenity space “where required” is too vague and will present developers and the Council with too much uncertainty - we suggest instead “where required by Policy DM 10”

Page 95 Policy DM9K Design Principles In Policy DM9K add after “endorsed by the Council” the words “(and the latest edition of the Essex Design Guide)”

Page 97 Policy DM10B In the light of our experience with recent planning applications, where this was an issue, we suggest adding after “children’s play space” the words “The availability of public amenity space nearby does not remove the requirement for private amenity space.”

Page 97 Policy DM10 new para F We suggest a new paragraph (F) to deal with inappropriate terracing: “Side extensions above ground floor level must be designed so as to avoid creating or exacerbating a terracing effect, by providing a gap of at least 1 metre or a suitable setting-back from the existing frontages” This would carry the council’s existing practice through to the new Plan.

Page 97 Policy DM10 new para G We suggest a new paragraph (G) in the same words as Policy DBE2 of the current Local Plan: “POLICY DBE2. 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.” This is an essential safeguard, needed to put the Vision and Objectives into practice. 5.3-5.6 Page 117

Overview of site selection process This appears to be a “black box”. Although the Council (apparently reluctantly) eventually supplied the categories used in the selection process, we are not aware that the details of the method used have been made available for public scrutiny. 5.28-5.49 Page 125 Vision and aspirations for Loughton/Loughton Broadway We agree with the “Vision for Loughton”, but not with some of the supporting material in this section. 5.29 Page 125 Loughton’s key strengths One of Loughton’s key strengths is its “human” scale. Properties in the High Road shopping area are no more than four storeys high; the shops in The Broadway are two-storey. The residential areas consist mainly of one- and two-storey dwellings, and are mainly free of higher dwellings or blocks of flats. In view of the constant pressure from developers for higher developments, we think that the draft Plan should provide greater protection for this important aspect of the character of the town. Loughton. The proposals fail to take any account of the need to maintain - let alone improve - the Quality of Life of the present residents. They fail to put the Vision and Objectives into practice. Furthermore there is a lack of real alternatives, casting doubt on the adequacy of the Consultation (see also our comments on page 8 and 3.54). 5.31-5.33 Page 125 We strongly disagree with the proposed number of houses for

Page 127 General Draft Policy P 2 Loughton A. Residential sites i. It appears odd to list particular sites in a “Policy”. ii. We disagree strongly with these proposals. The Council’s failure to properly consider settlements elsewhere (see 3.54 above) has resulted in a ridiculous amount of proposed urban intensification within the Town. We have considered each site in turn below (omission of a particular site implies no comment on our part). B. Infrastructure Requirements This states “Infrastructure requirements must be delivered at a rate and scale to meet the needs that arise from the proposed development, in accordance with the Infrastructure Delivery Plan.” See our comments on Draft Policy D 1: Delivery of Infrastructure at 6.3 below. Our concerns are highly relevant to the proposals for Loughton, where infrastructure such as schools, doctor’s surgery and public transport (buses and Underground) are already under significant stress. Page 127 SR-0226 Loughton London Underground car park. We have the following comments: i. Short-term parking provision. It appears from the map on page 221 that the area marked for development includes the area currently used as short-term parking for Underground travellers to be deposited and picked up. This is an essential feature and must be retained if the area is developed (when TfL, in breach of the planning conditions, closed off several spaces there was considerable congestion at peak periods, and lots of complaints from residents). It would not be appropriate to provide space in an underground or multi-story car-park on the site as an alternative, as the facility is used at all hours (trains run all night at weekends) and there would inevitably be serious safety concerns if vehicles are not easily visible. Note: this short-term parking

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area was instituted at LRA's request and forms part of the planning agreements agreed when the Sainsbury's store was proposed, between TfL, Sainsbury's, the County Council and the Council. ii. Type of development. The site is bounded by housing to the west, and the railway line to the south-east. It is important that any development here observes the draft Plan Objective to mitigate any new residential development from noise. It will be equally important to ensure that the design, density, layout and landscaping is sensitive to the existing residential housing to the west (and in particular that the height of any development respects the height of the surrounding developments, which are two-storey). iii. Parking. The density of housing proposed appears unrealistic if the site is also to provide the existing amount of parking for commuters, and also parking for the new residents and their visitors. The existing parking space is fully utilised on week-days, and there is very little other parking space nearby. Accordingly, either any new development would have to be restricted to one-bedroom flats, or extra parking spaces will be required. iv. Disruption during building work. The car-park is an essential part of the life of the Town. Without this parking space, where would commuters park, given that other space is already fully utilised, and that the Council is also proposing development on the Debden Station car-park? Competition from commuters for spaces in surrounding roads would prevent residents from parking.

Page 127 SR-0227

Debden London Underground Car

Park and land adjacent to station We have the following comments: i. Short-term parking provision. It appears from the map on page 221 that the area marked for development includes the area currently available for Underground travellers to be deposited and picked up. This is an essential feature and must be retained. It would not be appropriate to provide space in an underground or multi-story car-park on the site as an alternative, as the facility is used until the early mornings and there would inevitably be serious safety concerns if vehicles are not easily visible. ii. Type of development. The site is bounded by the railway line to the south-east. It is important that any development here observes the draft Plan Objective to mitigate any new residential development from noise. It will be equally important to ensure that the design, density, layout and landscaping is sensitive to the existing residential housing to the west (and in particular that the height of any development respects the height of the surrounding developments, which are two-storey). iii. Parking. The density of housing proposed appears unrealistic if the site is also to provide the existing amount of parking for commuters, and also parking for the new residents and their visitors. There is very little other parking space nearby. Accordingly, either any new development would have to be restricted to one-bedroom flats, or extra parking spaces will be required. iv. Disruption during building work. The car-park is an essential part of the life of the Town. Without this parking space, where would commuters park, given that other space is already fully utilised, and that the Council is also proposing development on the Loughton Station car-park? Competition from commuters for spaces in surrounding roads would prevent residents from parking. v.

Page 127 SR-0356

Borders Lane Playing Fields i.

Sports Hall. The College has had a long-term intention

of building a sports hall on this site but there is no mention of this in the Plan, although the Council is fully aware of this, as last year it decided to waive a covenant on the potential uses of the field, subject to the College making a planning application. ii. Type of development. The site is bounded by housing to the west, south-west and south-east. It is important that any residential development here observes the draft Plan Objective to ensure that the design, density, layout and landscaping is sensitive to the existing residential housing (and in particular that the height of any development respects the height of the surrounding developments, which are two-storey). iii.

Page 127 SR-0358

Sandford Avenue/Westall Road Amenity Open Space (also known as "Rochford Green")

From 3.96 "The NPPF (paragraph 77) requires the following tests are met in order to designate Local Green Space: • where the green space is in reasonably close proximity to the community it serves; • where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and • where the green space concerned is local in character and is not an extensive tract of land." i. We submit that this open space fulfils all of the criteria to be designated as Local Green Space. ii. Furthermore, it should not have been included in the list of sites, as it does not meet the requirement of Priority 3 "Sites located on open space within settlements where such selection would maintain adequate open space provision within the settlement" (see our comments on 3.54 above). The Council has adduced no evidence to show that, if it is included, there would be adequate open space; on the other hand, a large number of residents have testified (in response to this Consultation as part of an earlier application to register the green as a Village Green) that it forms an important part of their lives and that there is not otherwise adequate open space provision. iii. The character of this part of Debden stems from the original design of the estate, which in summary consists of relatively high density housing and associated open spaces,

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which provide opportunities for healthy recreation and visual amenity for residents. They are integral to residents' Quality of Life (the Draft Vision for the District (3.26) states that by 2033 the District will be a place where "residents continue to enjoy a good quality of life" - development of this site would therefore in direct contravention of the Vision. iv. Page 127 SR-0361 Colebrook Lane/Jessel Drive Amenity Open Space (also known as "Jessel Green" i. The area for development. The map shows the whole of this area marked out for development, for approximately 195 homes. The green contains a level area alongside Jessel Drive which is much used for local events (and also occasionally as a landing-site for air-ambulances); the rest of the area rises steeply to the south-west. ii. Inappropriateness of any of the area for development There seem to be two possibilities: · The Council intend development of the level area alongside Jessel Dive - this would clearly be inappropriate as it is the only level open space available to local residents or for landing an air-ambulance, and as such on its own would qualify for designation as a Local Green Space (see below), or · The Council intend to develop all or some of the steeply sloping part of the green. If so, we contend that given the slope and the visibility of such development to residents in surrounding residential properties, this would fail to meet that the draft Plan Objective to ensure that the design, density, layout and landscaping is sensitive to the existing residential housing. iii. Furthermore, it should not have been included in the list of sites, as it does not meet the requirement of Priority 3 "Sites located on open space within settlements where such selection would maintain adequate open space provision within the settlement" (see our comments on 3.54 above). The Council has adduced no evidence to show that, if it is included, there would be adequate open space; on the other hand, a large number of residents have testified (in response to this Consultation as part of an earlier application to register the green as a Village Green) that it forms an important part of their lives and that there is not otherwise adequate open space provision. iv. The character of this part of Debden stems from the original design of the estate, which in summary consists of relatively high density housing and associated open spaces, which provide opportunities for healthy recreation and visual amenity for residents. They are integral to residents' Quality of Life (the Draft Vision for the District (3.26) states that by 2033 the District will be a place where "residents continue to enjoy a good quality of life" - development of this site would therefore in direct contravention of the Vision. Note: Local Green Space: from 3.96 "The NPPF (paragraph 77) requires the following tests are met in order to designate Local Green Space: · where the green space is in reasonably close proximity to the community it serves; · where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and · where the green space concerned is local in character and is not an extensive tract of land." We submit that this open space fulfils all of the criteria to be designated as Local Green Space. Page 127 SR-0527 Royal Oak public house, Forest Road. The Council has included this in the draft Plan for a development of approximately 14 homes. However, following objections from residents, Loughton Town Council and the LRA Plans Group (which operates entirely separately from LRA Cllrs), the Council has recently turned down a planning application (EPF/2042/16) for 14 dwellings on this site on the grounds of overdevelopment, mentioning the possibility of a smaller development in the Way Forward (in principle, we are not opposed to a smaller development). Page 127 SR-0548 Loughton Resource Centre, Torrington Drive It is surprising to find this site included, and this appears to contravene draft Policy D 4 - Community, Leisure and Cultural Facilities. Existing facilities valued by the community should be retained or enhanced, and the Council give no indication of any potential nearby alternative community provision. Page 127 SR-0565 Loughton Library and adjacent car park i. Scope of proposal. We note that the Council have now said that the area in question does not include the Library itself - in that case, the description of this site seems to have been an extremely careless error which might call into question the accuracy of other parts of the draft! ii. Nature of possible developments. We understand that any development might be of an underground car-park, with dwellings above, or a block or blocks of housing together with a car-park several stories high. iii. Topography. The site slopes sharply down to the south-west from the entrance on Traps Hill (which also serves the Leisure Centre). In designating this site for housing, no account seems to have been taken of its topography! An underground car-park would have to be entered from the lower end of the site (the south-west), at the furthest point from the entrance from Traps Hill, requiring all traffic entering and leaving the car-park to travel the length of the site, past the dwellings above the car-park, and across the entrance to the Leisure Centre.

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iv. Type of development. The site is bounded by one-storey and two-storey housing to the south-east and south-west; it will be important that any proposed development observes the draft Plan Objective to ensure that the design, density, layout and landscaping is sensitive to the existing residential housing, particularly as the existing housing lies at a level lower than this site.

v. Parking. The density of housing proposed appears unrealistic if the site is also to provide the existing amount of parking for residents and shoppers, and also parking for the new residents and their visitors. At times the existing parking space is fully utilised, and there is very little other parking space nearby. Accordingly, either any new development would have to be restricted to one-bedroom flats, or extra parking spaces will be required.

vi. Disruption during building work. The car-park is an essential part of the commercial and leisure life of the Town. Given the nature of the site, any development would have to involve substantial preparatory work, extending the time-scale considerably. Without this parking space, where would shoppers park? Where would visitors to the Library, the doctors' surgery and the children's playground park?

Other nearby parking spaces are already often fully utilised, and that the Council is also proposing development on the Loughton Station car-park - development on one site would cripple the Town's economy; development at the same time on both sites would be disastrous (and the Council would have no power to prevent this).

Page 127

SR-0834 Car park west of High Road.

This appears to be the former Post Office depot and associated car parking.

The Council has included this in the draft Plan for a development of approximately 30 homes. However, following objections from residents, Loughton Town Council and the LRA Plans Group (which operates entirely separately from LRA Cllrs), the Council has recently turned down a planning application (EPF/1545/16) for 30 dwellings on this site on the grounds of overdevelopment, mentioning the possibility of a smaller development in the Way Forward (in principle, we are not opposed to a smaller development).

Page 127 P 2 C Town Centre uses

We welcome part C of draft Policy P 2. However, we understand that the non-retail proportion in the High Road Primary Retail frontage is already over 30% - we consider that the Policy should deal with this aspect by adding in draft Policy P 2, to maintain the retail level as specified (70% or 30%) or, where the level is already below 70% or 30%, to maintain it at that lower level.

6.3

Page 185 Draft Policy D 1: Delivery of Infrastructure.

We welcome the Council's intention to develop "an Infrastructure Delivery Plan (IDP) which, when completed, will set out the infrastructure required to support growth over the Plan period", in conjunction with other organisations.

However, we fear that in practice the Council will not be able to "ensure, through the implementation of its draft policies outlined below and throughout the Plan, that the infrastructure identified in the IDP is delivered and phased appropriately."

Draft Policy D 1 provides that "Planning permission will only be granted for developments where the infrastructure and services required to meet the needs of the new development and/or mitigate the impact of the new development is either already in place or will be provided to an agreed timescale."

See in particular our comments above on Transport (4.73-4.89).

Even where an infrastructure provider is prepared to make the necessary changes, we foresee significant problems in establishing who will foot the bill, particularly for smaller sites where a contribution from the developer would render

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the development uneconomic for the developer, and where the scale of the development will mean that providing infrastructure without a financial contribution will be low on the infrastructure providers' priorities.

The NPPF requires that "Local Plans should be aspirational but realistic."

The draft Plan fails to meet this requirement (see for example 4.73-4.89 above on Transport)

It seems to us to be highly probable that, despite the Council's best efforts, planning applications which the Council turns down on the grounds of a lack of infrastructure will be approved on appeal, and we would welcome knowing whether the Council has explored this aspect with national Government?

The same concerns arise in respect of draft Policies D 2, D 3 and D 4.

6.16-6.19

Page 187 Education

We note that Essex County Council now considers that there will be a need for a new secondary school in the next ten years, on the basis of current population trends - that is, without the extra housing predicated in the draft Plan.

The District Council has failed to allocate any land for a new school; indeed, despite strong local opposition it has recently agreed to the removal of covenants restricting use to education or NHS purposes on two of the sites allocated for housing in the draft Plan (Borders Lane Playing Fields and Old Epping Forest College site, Borders Lane).

6.20-6.24

Page 188 Health

We believe existing doctors' practices to be oversubscribed, and note that the Council has not allocated any land for new surgeries.

6.27-6.28

Page 189 Utilities

See our comments on Draft Policy D 1: Delivery of Infrastructure (6.3 above)

6.38-6.40

Policy D5

Page 192 Communications Infrastructure

To give effect to the Vision and Objectives, draft Policy D 5 Communications Infrastructure should be related to draft policies SP 4, SP 5 and SP 6, given that the likely sites for masts will conflict with protecting Loughton's green infrastructure.

Note: in 2011 a number of Loughton sites for telecoms masts were proposed - most were turned down by the Council because of their potential impact on the visual amenity of the area.

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