

Gary Woodhall

From: Cllr Chris Pond <[REDACTED]>
Sent: 27 January 2018 14:25
To: LDFconsult
Cc: [REDACTED]
Subject: Representation on the Regulation 19 Submission Version of the Epping Forest District Local Plan

Representation on the Regulation 19 Submission Version of the Epping Forest District Local Plan

by Councillor Chris Pond
made in my capacity as a local councillor, St Johns Ward LTC, Broadway Ward EFDC,
Loughton Central ECC.

Part A

Cllr Dr Chris Pond

[REDACTED]

I wish to participate in the hearings, as a representative in my ward and county division, because the Plan is vital to the interests of my constituents. I chair the Loughton and District Historical Society, and my comments on policy DM7 reflect that also.

Part of Plan to make representations on. *Much of it as detailed in Part B below*

I make no comment on legal compliance or the duty to cooperate
I believe the plan is unsound at present, but could potentially be made sound by changes as detailed in each section below:

I wish to be notified of the dates of the EiP.
Signed with the electronic signature of C C POND
<<%EQ0987HM22|# >>at the foot of this email, dated 26 January 2018

There are no attachments to this email.

Part B

Comments on the Local Plan process generally

The EFDC lead officer for the Local Plan stated at a meeting of the EFDC Constitution Working Group on 25.1.18 that the Plan was bound to be adjudged sound, in relation to suggestions for sites put forward but not selected, as "*..Inspectors had been instructed not to consider alternative sites if housing numbers in a submission version plan were up to target..*" I believe this would be improper, if site selection criteria were flawed, as I consider they have been in this case. The fact that no list of extra sites suggested between the Reg 18 and Reg 19 stages and their scoring was available even at the end of the Reg 19 consultation period, and may not even have been done, suggests that the consultation and site selection process must be adjudged as flawed. It is surely also contrary to natural justice for those promoting sites. It is my view that some of the extra sites suggested have considerable merit, and could obviate the taking of public parks/open spaces (see below), but these merits have never even been assessed.

The Plan could be made sound by a rigorous and publicly available assessment of the 160 new sites and comparison with those that *are* selected in the Plan.

Loughton Site R5, Jessel Green

Jessel Green is an open space of some 15 acres that was set aside as an open space for public enjoyment by the London County Council after they laid out their Debden out-county estate from 1945 to 53. This was a deliberate creation of a public open space, and their open spaces byelaws were subsequently applied to it by means of public notices. This use was continued by their successors in 1965, the Greater London Council, and from 1980, EFDC. The present extent of the open space is shown on the architects' model of the Estate, photographs of which are in the London Metropolitan Archives. This shows the *ab initio* intention of the then landowner, the LCC, to dedicate it as a public park, albeit one that was left as an open hillside, a reminder of Debden's rural past, rather than laid out with walks and flowerbeds.

I therefore contend EFDC were wrong merely to regard it as vacant urban land in their site analysis and so-called sequential test.

Jessel Green is highly regarded and well used by the local people; no evidence has been presented as to lack of use, and several petitions and representations bearing some thousands of signatures have been made about it.

The plan is thus UNSOUND *and could be made sound by omitting Site R5.*

Policy P2

Transport

The Plan purports to locate residential development near the Central Line but fails to take into consideration that there is no capacity on the Central Line in peak hours. The Plan is UNSOUND because the necessary railway infrastructure cannot be provided within the plan period before 2030, and EFDC have no locus to provide or influence it, eg through CIL or s106 provisions. They also have very limited scope to influence bus provision as they are not a transport authority, and Essex County Council have recently reduced subsidy to TfL and local bus operators, resulting in a 40-55% reduction in local bus services near some of the selected Loughton sites.

The plan could be made sound by deferring any large scale development in Loughton until after Central Line capacity improvements have been effected c.2031.

Policy DM2A

This policy is defective as it does not protect the whole Forest, only that part in the Special Area of Conservation. The whole of the Forest, as delineated in the Epping Forest Act 1878 and the subsequent Arbitration by Sir John Hobhouse, should be included, otherwise protection is inadequate.

The plan is UNSOUND with its current wording and definition.

Policy DM7

Heritage

Heritage policies are of limited value if they are not subject to review. Undesignated heritage assets are given some protection by NPPF 134-137, but it is much preferable if conservation areas, areas of townscape merit, and the Local Lst are properly established and kept up to date. No mechanism is suggested in the Plan to consider suggestions for new CAs, to establish ATMs (as suggested by EFDC's Heritage Assets Review) or candidates to add to the Local List. This unsoundness could be remedied by a commitment to review periodically.

Other policies

I have been shown a draft of the Loughton Town Council and Loughton Residents' Association comments, and am in broad agreement with their more detailed objections, especially on Policies DM6 and DM9.

