

28 Mowbrey Gardens

Loughton

Essex

IG10 2EU

[REDACTED]

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Representation Re EFDC Local Plan Appendices B+C

I object to inclusion of site SR-0361 in the SLP because Allocation Justification in Appendix B1.6.6 has:

AA. Ignored National and the Council's own planning policies, the Consultation responses and the Conservators of Epping Forest comments 2016.

BB. Either ignored or misused evidence in comparison with the way it was applied to other sites removed from the plan. References made to other sites are to illustrate those points. I do not suggest that they should be included.

Appendix B1.6.6 - Results of Identifying Sites for Allocation gave this reason for inclusion of SR-0361:

“This site was identified as available within the next five to ten years. It has no identified constraints or restrictions which would prevent it coming forward for development. Taking into account community feedback received through the Regulation 18 Draft Local Plan consultation, it is proposed that the allocation is limited to half of the site, with details to be resolved through the proposed Jessel Green Masterplan.”

Re AA.

The inclusion does not comply with National Planning Policy Framework sections 76 and particularly 77 where it seems to meet all requirements for exclusion:

“where the green space is in reasonably close proximity to the community it serves;”

It is in the middle of a large housing estate.

“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”

Jessel Green is a focal point for community activity, a beauty spot in a built-up area with panoramic views and maturing trees. Its contemporary history and significance are in progress. It is the central feature of the Debden Estate. Created since the 1950s as a garden city to house overspill from the

East of London following the ravages of the second world war. To destroy it will rob future generations of that potential and ruin the original concept. It has multipurpose use for recreation and tranquillity. That is supported by the Conservators of Epping Forest. Historically the Green owes its name to Sir George Jessel. In 1874 he was Master of The Rolls and made a historic judgement to save Epping Forest for commoners from encroachment from wealthy landowners. It is a supreme irony that EFDC chose to build on a space named after a man who played a major role in preserving much of the whole district.

“where the green area concerned is local in character and is not an extensive tract of land.”

Jessel Green blends perfectly with the area. Its multipurpose use reflects the nature and needs of the community. The SSA in appendix C 5.2 for LOU.R5 ex SR-0361 specifically states “redevelopment has the potential to adversely affect the character of the area”.

The inclusion does not comply with the Council's own policy DM6:

“Policy DM 6 Designated and Undesignated Open Spaces

A. Where appropriate development proposals will be required to provide open space, or links to open space in accordance with the guidance contained within the Infrastructure Delivery Plan and Open Space Strategy. Nationally adopted space standards will be used as a starting point for provision.

B. Development on open spaces will only be permitted if it does not result in a net loss of usable public open space or reasonable access to alternative open space within a settlement. Existing open space should not be built upon unless:

an assessment has been undertaken showing the land to be surplus to requirements; or

development would not have a detrimental impact upon the accessibility to open space;

or

the loss would be replaced by equivalent or better provision in terms of quantity or

quality in a suitable location; or (iv) the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

C. In circumstances where partial loss of the space is considered justified, the predominantly open nature of the remainder of the site should be maintained and enhanced together with the visual amenity and its function as appropriate for active play and recreation.”

Jessel Green is an entity in its entirety. It is not surplus to requirements. There is no alternative space in the area that could be offered. Partial loss would destroy its ambiance and value to the community. Its inclusion is not consistent with this policy.

Draft Local Plan Consultation Report 2017 P82 15.4.2 Draft Policy P 2 Loughton

Related to SR-0361, Appendix B1.6.6 makes scant reference to the following assessment from the above report:

“Proposed site SR-0361, (Colebrook Lane / Jessel Drive Amenity Open Space) received significant objection. Respondents expressed opposition to the loss of managed public open space in Loughton, which was stated to be very important to the local community in maintaining their quality of life; improving health and also providing residents with an opportunity to socialise and exercise. 228 respondents specifically disagreed with the redevelopment of Jessel Green, with residents also calling for it to be given village green status.

Respondents discussed the original design ethos behind the Debden Estate and the importance of central public open spaces for residents in this urban area of Epping Forest District. It was also suggested that the Draft Local Plan had selected areas of managed public open space, such as Jessel Green, as it was an easier option compared to other sites in other settlements in the District.”

COMMENTS by THE CONSERVATORS of EPPING FOREST on the EPPING FOREST DISTRICT LOCAL PLAN (REGULATION 18) CONSULTATION (December 2016)

Appendix B1.6.6 does not make any reference to the following assessment from the CoEF report:

“At Loughton The Conservators would disagree with the proposed loss of green space at Borders Lane and Jessel Green. The latter site in particular, if lost, would place considerable pressure on the nearby Forest and also would seem to be in contradiction to the green infrastructure policies in the draft Plan. Such a large green space is currently valuable and has considerable potential to be developed for both access and for wildlife.”

The Conservators specifically reinforce their view in their own Regulation 19 Response Paragraph 13 Policy P2. Loughton which I would kindly refer you to.

BB.

For comparison purposes Appendix B1.6.6 gives these reasons for exclusion of both sites SR0026B+C

“Although the site was proposed for allocation in the Draft Local Plan (2016) and remains available within the first five years of the Plan period it is not proposed for allocation. Responses received through the Regulation 18 Draft Local Plan consultation indicated that the site is less preferred by the community as a result of the scale of growth proposed. Additionally the Conservators of Epping Forest raised concerns around the overall scale of growth proposed in Theydon Bois, which is located in close proximity to the Epping Forest SAC, and the potential effects arising from recreational pressure and air quality. The Conservators identified the need for a SANG to compensate for the scale of growth, which may adversely affect the deliverability of the site. It was considered that other sites in Theydon Bois were more preferable in terms of their overall suitability and if allocated they would provide the desired growth in the settlement. This site is not proposed for allocation.

There are two specific parts of this that have unequal preference in comparison to the way evidence was used for site SR-0361.

1.

It suggests that sites SR0026B+C are “less preferred by the community” as indicated by consultation responses. For SR-0361 the appendix refers to “community feedback” as a reason for a 50% reduction but does not note “received significant objection” as stated above in the Draft Local Plan Consultation Report 2017 P82 15.4.2 Draft Policy P 2 Loughton. EFDC know the site is loved by the community, it is a feature in its entirety and building on any part would be vandalism.

2.

In the **COMMENTS by THE CONSERVATORS of EPPING FOREST 2016 (CoEF)** there was specific disagreement to inclusion of Jessel Green (SR-0361) for reasons they stated above. There was no qualification or recommendation about part development. Despite a cumulative 1000+ homes proposed across Loughton, of which most are with 5Km of Epping Forest, there is no mention of a requirement for a SANG as they disagreed with any part of SR-0361 being developed. Appendix B1.6.6 omits any reference to this.

In relation to sites SR0026B+C the Appendix made the above assessment of the CoEF comments which actually said:

(The Theydon Bois sites include SR0026B+C)

“The allocation at Theydon Bois is a very large block of housing which would represent over 20% increase in the population of this settlement. This would need a SANG **in our view, despite the lower than 400 house threshold (see HRA para 6.4.10).**”

and:

“For example, there are very significant proposals below 400 houses such as the 360 houses at Theydon Bois or the cumulative total of 804 houses across 3 site allocations in Epping (SR0153, SR0069/33 and SR0113B). In doing so we would suggest that some consideration should be given to **a sliding scale in relation to the size of the developments and the contribution of or towards SANGS and recreational provision in the Forest.**”

Conclusion

The interpretation of evidence related to site SR-0361 has been selective and appendix B1.6.6 ignores or makes light of serious, valid objections.

There is no mention of the CoEF comments. By comparison, a correct interpretation is that they recommended omission of SR-0361 from the SLP and, subject to recommendations, are not opposed to reduced size developments of SR0026B+C. The opposite of the Allocation Justifications stated in Appendix B1.6.6 for the respective sites.

A wealth of evidence supporting the saving of Jessel Green for reasons of local services, infrastructure, proximity to public transport etc., were made to EFDC but the appendix does not mention one word. Many other representations to you will cover those.

Despite huge public disapproval with 100% support from Loughton councillors going back years, EFDC have consistently ignored the community. The proposal to develop half of Jessel Green is an insulting sop and viewed locally as akin to developing half of Hyde Park.

I suggest the selection of SR-0361 for development was chosen at the outset of this process. The evidence has been wrongly interpreted in the Allocation Justification to warrant that choice as it is clearly not supported by the actual evidence.

As demonstrated the inclusion of Jessel Green in the SLP is contrary to Policies and presented evidence, is inappropriate and unjustified. I respectfully urge you to take what steps you have available to you to remove it from the Local Plan.

Thank you for your time and attention.

Mark Hickey

22nd, April 2018