Stakeholder Reference:
Document Reference:

Part A

Making representation as Resident or Member of the General Public

Personal Details		Agent's Details (if applicable)
Title	Mr	
First Name	Matthew	
Last Name	Ayers	
Job Title (where relevant)		
Organisation (where relevant)		
Address		
Post Code		
Telephone Number		
E-mail Address		

Part B

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?
Paragraph: 5.33
Policy: P 2 Loughton
Policies Map: Yes
Site Reference: LOU.R5
Settlement: Loughton

Do you consider this part of the Pre Submission Local Plan to be:
Legally compliant: Don't Know
Sound: No
If no, then which of the soundness test(s) does it fail? Positively prepared,Justified,Consistent with national policy
Complies with the duty to co-operate? Don't Know

Please give details either of why you consider the Submission Version of the Local Plan is not legally compliant, is unsound or fails to comply with the duty to co-operate; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible. Please use this box to set out your comments.

Positively prepared & Justified

As land owner, Epping Forest District council put forward site LOU.R5 (Urban Open Space between Jessel Drive and Goldingham Avenue, Loughton - 1.87 hectares) for assessment as part of the call for sites process in October 2008.

Since then two rounds of initial consultation have been undertaken by the council in 2011 and

2012. The Community Visioning Consultation in 2011 sought to understand what the planning

issues are for the local community and how people would like to see the area develop in the

future:

• Q1: What do you think the priorities are for the District over the next 20 years?

• 32.4% (the largest response) said 'Protect & enhance green spaces' (not focused solely on greenbelt)

• Q2: What planning issues do you think most need to be addressed in your local area?

• 20.6% (the largest response) said 'Protect green spaces' (not focused solely on greenbelt)

The Community Choices consultation July - Oct 2012 set out the main issues that need to be

considered and addressed by the Local Plan over the next 20 years. 6,000 responses were received. (Urban Open Space between Jessel Drive and Goldingham Avenue, Loughton - 1.87

hectares) was not listed in the Loughton sites under Question 41, page 115 of the 'Planning our

Future' Issues & Options for the Local Plan. Again residents expressed protecting open spaces.

In 2016, the council consulted with the public on the draft Regulation 18 Local Plan. Residents in

Loughton wrote in large numbers to object to (Urban Open Space between Jessel Drive and Goldingham Avenue, Loughton - 1.87 hectares) being added into the list of sites.

The EFD Regulation 19 Submission Local Plan has been published with a period of public consultation on its soundness. A petition (Save Jessel Green) has started. Within two weeks of

the petition starting 4,112 people have objected to the council including site LOU.R5 in the Local

Plan list of sites.

The public have been ignored at every stage of the Local Plan process.

Consistent with planning policy

In respect to the allocation of Jessel Green, site LOU.R5 for a housing development, the plan is unsound, as non-compliant with NPFF National Guidance Paras 73, 74, 76 and 77 for the

following reasons:
1. The evidence provided by the EFDC Open Space Strategy Nov 2017 by 4 Global identifies a significant shortfall in recreation space for young people. Furthermore, the Open space audit of March 2009 commissioned by EFDC for Loughton states that Jessel Green was well used by young people and its use has grown significantly since then. Building on this location will therefore create a further deficit in open recreational space, which is counter intuitive and contrary in the extreme to the healthy community objectives that EFDC aspire to, in its commitment to National Planning Policy.
2. Loughton residents through its Local Town Council have identified Jessel Green as having special importance as a Local Green Space, specifically as a highly utilised and valuable recreation space at the heart of Loughton. This request and requirement made by the Loughton community through its elected representatives, Loughton Town Council has not been taken into account by EFDC and its consultants ARUP, despite an overwhelming petition and response from local residents to the proposals for residential development on this open space. To confirm, this open space is enjoyed by all ages and abilities throughout the year, which culminates in an annual event, which brings together 1000s of residents across the district to a community fun day. This location therefore has a unique significance and provides an incredibly valuable service in connecting the community.
3. There is no provision in the plan for replacing this valuable recreation space, if built on, so again is not compliant with National Planning Policy.

Please set out what change(s) you consider necessary to make the Pre Submission Local Plan legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

On Page 121 of the submission version para 5.33 should be replaced with, 'In its commitment to promote healthy communities, Jessel Green shall be designated as a 'Local Green Space' as having unique importance to the local community as a vital recreation space and connection point for the local community. This is consistent with National Policy in promoting healthy communities, specifically it is fully compliant and aligns with the requirements as set out in NPFF para 77, to provide this status to spaces that are particularly valued by the local community. EFDC by doing this will set a high bar in protecting such important space that is both highly valued and well used by the local community, as well as preventing any further shortfall in space for young people to grow and flourish. Naturally on Page 122 LOU R5 should be therefore removed from the list of residential sites under section B, Policy P2 Loughton.

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination

Yes

Signature: Matthew Ayers Date: 27/01/2018

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