

**Theresa Parker**

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**Subject:** FW: Local Plan Regulation 19 Representation  
**Attachments:** Response Submission - S Carrette.pdf  
**Importance:** High

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**From:** Sue Carrette  
**Sent:** 28 January 2018 02:51  
**To:** LDFconsult  
**Subject:** Local Plan Regulation 19 Representation  
**Importance:** High

Dear Sir/Madam,

Please find attached my submission to the current stage of the Local Plan consultation.

Please confirm receipt of this submission.

Regards

**Sue Carrette**



Details required on form 'Representation form for Submission Version of the Epping Forest District Local Plan 2011-2033 (Regulation 19 publication)' - Part A

I am making representation as a Resident.

Personal Details

Title: Ms

Name Susan Carrette

Address: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Email: [REDACTED]

Submission

I consider the Regulation 19 (Submission Version) Epping Forest District Local Plan defective and unsound for the following reasons:

- A. It incorporates a central and unsupported sequential test which leads to greenfield recreational land in towns being given a higher development priority than similar land elsewhere
- B. It ignores the amenity and wellbeing value of public urban open space, and the great public affection of residents and others for Jessel Green (LOU.R5)
- C. It purports to support and enhance such land, but as a contradiction, proposes to allocate it for housing
- D. It relies on a so called proportionate distribution of housing whereas in fact it allocates Loughton 196 dwellings per square mile where an even spread would be 67 dwellings per square mile
- E. Site selection across Epping Forest District has not been consistently assessed
- F. Alternative sites were offered by land owners within Loughton and neighbouring towns, which would remove the need for any housing allocation on Jessel Green, but have been removed from the Regulation 19 Submission version of the Epping Forest District Local Plan
- G. Jessel Green appears to meet the criteria for designation as a Local Green Space in accordance with National Planning Policy Framework sections 76 and 77.
- H. Emergency services (the Essex & Hertfordshire Air Ambulance service) use Jessel Green as a landing location in extreme cases – 5 times in the last 18 months. They cannot use any other flat Open Green Space on the Debden estate.
- I. City of London/Conservators of Epping Forest in their 2016 Draft Local Plan consultation response identified concerns over this site being included (page 8);
- J. 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.
- K. All schools in the area (5 actually on the Debden estate) oppose this volume of development due to overcapacity and health impact on its children and their families.

- The inclusion of large developments throughout Loughton will have a cumulative negative effect.
- L. All local bus services in Loughton have either been reduced to a limited service or are under review. One bus route has been withdrawn from the Debden Estate entirely after several decades of providing a vital link between north Loughton and north east London. Neither Essex County Council or London Transport adequately resource public transport within the district.
  - M. According to Transport for London's 2016 Draft Local Plan consultation response, they are relying on Crossrail opening in 2019 to reduce its capacity problems. This is on the basis that commuters will be willing to travel substantially further to board trains in The London Boroughs of Havering, Newham or Waltham Forest. There is no evidence to suggest either that commuters would be willing to do this – or even if they were, that it would be logistically possible given the increased road traffic (and decreased parking) as a direct result of the urban intensification proposed by the Plan
  - N. Encouraging more car use, congestion, parking pressures and increased poor air quality does not support EFDC's Air Quality or Sustainability Transport (Policy CP9) and Sustainable Travel Plans (Policy ST5) policies.
  - O. Roads throughout the Debden estate are underserved greatly by Essex County Council Highways, with only one road on the estate being re-surfaced in the last 8 years.
  - P. The use of any part of Jessel Green is unjustified as contradicts the policies in the LP on open space. Open space dedicated to the public is entirely different from vacant land in towns, and is protected by the Open Spaces Act 1906.
  - Q. Development on station car parks cannot be achieved without the following (all of which threaten and are contradictory to, aspects of the Plan including quality of life and maintenance of air quality, conservation of Epping Forest):
    - a. Building to excessive height
    - b. The creation of unsafe underground car parks which will given their enclosed construction additionally be disproportionately unsafe for some groups of drivers and therefore discriminatory
    - c. A level of urban intensification within the South of the Epping Forest District (Loughton in particular) which is entirely unsustainable
  - R. Large scale development in Loughton not achievable in any way which is sustainable, due to inevitable adverse impact on air quality and the Forest AND the fact that the Central Line is already operating at full capacity with no possibility of enhancing this – which in turn results in further cars on the road

We therefore respectfully ask you to:

1. Remove the following sites from the Regulation 19 (Submission Version) Epping Forest District Local Plan.
  - a) LOU R1 Loughton tube – 165 homes
  - b) LOU R2 Debden tube – 192 homes
  - c) LOU R4 Borders Lane playing fields – 217
  - d) EPP R3 Epping tube – 89 homes

TOTAL 663
2. Advise Epping Forest District Council to support the request by Loughton Town Council, to register site LOU.R5 (Jessel Green) as a protected 'Village Green' as per the application to Essex County Council in December 2013.
3. Advise Epping Forest District Council to actively gather independent evidence to consider whether the total number of new homes proposed for the District as a whole

– and Loughton and Epping specifically - is still genuinely required to support internal growth within the District, rather than net migration into the District from adjacent London boroughs and elsewhere

