

Stakeholder Reference:

Document Reference:

Part A

Making representation as Chair of The Loughton Broadway Town Centre Partnership

Personal Details		Agent's Details (if applicable)
Title	Mrs	
First Name	Judy	
Last Name	Lovell	
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Organisation (where relevant)	The Loughton Broadway Town Centre Partnership	
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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.

The Loughton Broadway Town Centre Partnership (TLBTCP) considers the Epping Forest District Local Plan Submission Version December 2017 (the Plan) to be unsound in its present form. Therefore as Chair I have been asked to submit our objections.

There is the proposal of 154 homes being built on Jessel Green. (Loughton P2 B (v))

However the plan states 'Research undertaken nationally has been inconclusive as to whether reducing car parking in new developments has any effect on car ownership and this appears to be backed up by, albeit somewhat dated, post-occupancy research undertaken in relation to new residential developments that many households will still want to have access to a car.' (3.87)

(TLBTCP) do not believe the proposal to build these homes to be sound as there is already pressure on parking in the neighbourhood, bus services have been cut and the underground (Central line) is at capacity at the time most people would be going to work.

The plan also says 'Open space provision is critical to the physical and mental health of our communities, as well as important to our experience of the character of settlements and the landscape in the District. The population growth expected over the Plan period will add to demand for space for all forms of recreation.' (4.44)

We do not believe the proposal to use Jessel Green to be sound as it will decrease the amount of space available at the same time as adding to the demand for it.

The plan further states (Included in Vision for Loughton) 'The impact of further development on Epping Forest, both in terms of air quality and also in terms of further recreational pressure will be minimised and mitigation measures will have been implemented where necessary.'

We believe that is further reason why building houses on Jessel Green is unsound as air quality will be adversely affected.

We also believe that there is insufficient infrastructure in place to support the additional needs of extra residents.

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.

The plan could be made sound by removing the plan to build on Jessel Green and building 154 additional homes in the Garden Town Communities.

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:

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph: 5.39

Policy: E 2 Centre Hierarchy/Retail Policy

Policies Map: No

Site Reference: None of the above

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,Effective

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.

The plan states (Vision for Loughton) 'Loughton Broadway will be the focus of further enhancement and the new Epping Forest Shopping Park (EFSP) will provide a complementary retail offer.'

And also

Policy E2 H

The proposal would not put at risk or harm proposals to safeguard the vitality and viability of any nearby town centre;

The proposal would not cause material harm to the vitality and viability of any nearby town centre;

We believe the (EFSP) is in direct competition with the retail outlets in Debden Broadway and is therefore not a complementary shopping Centre.

The Epping Forest District Councils (EFDCs) initial brief for the (EFSP) was to provide a retail Fashion driven centre which would have complemented both Debden Broadway and Loughton, however the way the policy has been implemented and the final allocation of the retail units away from that has resulted in businesses in the area that are in direct competition with existing long established local traders. Currently there are 3 shops that are not fashion led, and that are the same as on The Broadway - a supermarket, a pet store, and a card shop

From the very beginning of the process various local groups had expressed concern about the (EFSP) and the possible negative effect upon the existing retail trade in the local area. There is evidence to show that retailers in Debden Broadway are suffering as a direct result of the EFDCs failure to correctly research and implement a balanced parking policy in the area.

There is disparity between parking. Shoppers can pay up to £3.80 for a 3 hour stay in Debden Broadway and in other Loughton area Retail cars parks, this is not the case in the (EFSP) where parking up to 3 hours is completely free of charge. This is contradictory to policy in the local plan. In spite of numerous representations to the council from traders there is no provision made to ensure there are equally favourable parking opportunities on Debden Broadway Unless there are equally favourable parking opportunities on Debden Broadway and a holistic view of the management of the Broadway and EFSP the aspiration of the EFDC for these centres to remain successful will not be met. The policy here has not been positively prepared and successfully implemented.

Minutes of a meeting of the Broadway Town Centre Partnership in July 2012 and an email from a council officer have been attached.

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.

The plan could be made sound by providing equal parking opportunities for both the Epping Forest Shopping Park and the Loughton Broadway and by ensuring that only complementary shops are given leases.

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: Judy Lovell Date: 27/01/2018