

Please find attached my Regulation 19 Representation and reproduced below:

**Planning Policy,  
Epping Forest District Council,  
Civic Offices,  
323 High Street,  
Epping, Essex,  
CM16 4BZ**

**And**

**[LDFconsult@eppingforestdc.gov.uk](mailto:LDFconsult@eppingforestdc.gov.uk)**

**Dear sir,**

**I am making this representation as a resident of Loughton.**

**My Personal Details are as follows;**

**Mr Christopher Roberts**

## **Infrastructure.**

### **T 1 Sustainable Transport Choices**

The submission version of the Local Plan is not positively prepared, justified, effective or consistent with national policy. It fails to state how effective services are to be secured. Unless there is a clear mechanism for doing so, the provisions of the Plan fail to be positively prepared, nor will the Plan be effective.

The plan does not take correctly into account the current state of the existing infrastructure within the Loughton area, of particular concern is the emphasis placed upon development near to and reliant upon existing major road, rail networks and bus services .

The Central Line quotes that it is near capacity in peak times. The situation on the underground is in fact far worse than TFL would have you realise because to reach the near capacity figurers quoted by TFL the line has to operate its remaining rolling stock consistently at +100% which is obvious if you consider TFLs own service data, this is because of lost mileage and service suspensions due to faults on the line, faulty trains, staff issues and the increasing age and unreliability of their infrastructure. This equates to extreme overcrowding on the remaining service which produces an additional factor as often we hear of a passenger taken ill causing additional disruption.

I see this first hand as I use the Central Line daily, commuters are literally pushed into and squashed in so these trains are being used in excess of their design capacity in order to produce figures showing under capacity usage. With new rolling stock not expected in service on this line until 2030 and without the physical room to

expand the situation is set to get very much worse even without the addition of new homes and increasing population. You can see these networks are already Woking at or close to capacity and without the prospect of realistic improvement within the near to midterm life expectancy of the plan. The councils own Sustainability Appraisal is not accurate.

Any additional housing in the central line corridor can be expected to produce a significant increase in both rail and road travel into London and the surrounding areas, thus contravening Policy T1B & T1C which provide for; B= Development should seek to minimise the need to travel and C= Development proposals will be permitted where they do not result in unacceptable increases in traffic.

The infrastructure plan envisages the growth of motor traffic from developments in Loughton would require substantial improvements. This cannot be realised as detailed in the plan as the council do not control the availability of the required land. Existing infrastructure in respect to schools, NHS Doctors and Dental in the Loughton area are hard to access for instance the primary school provision has no additional capacity in excess of its current projections when we checked in November 2017 there were only 3 spare school places as of this date there are no primary places available. I can testify first hand that patients at one local doctor's surgery which has been recently upgraded are waiting up to one month for a non-emergency appointment to see a doctor.

All this information has been provided to EFDC by District and Town Councillors during Local Plan workshops and by resident taking part in the regulation 18 consultation. The Councils is so determined to push through it has failed to listen. The plan is lacking in robust factually researched data that has been qualified independently. The plan fails to programme suitably for infrastructure improvement, the model used for forecasting future need has grossly under estimated the requirement.

Because of the plans "failure to take into account material considerations as effective, constructive, and ongoing I believe this duty has not been discharged. The Local Plan is not positively prepared, justified, effective or consistent with national policy. The plan is contradicting itself far too often Therefore it is not sound.

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**Vision for Loughton Policy.**

**SP3 shopping facilities to support day-to-day needs in walkable neighbourhoods.**

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

We do not believe this to be the case as the (EFSP) is actually in direct competition with the retail outlets in Debden Broadway/Loughton and is 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 complimented both Debden Broadway and Loughton, however the way the policy has been implemented and the final allocation of the retail units away from what was originally intended has resulted in a complete mismatch of retailers in (EFSP) not planned in any way. This was caused by (EFDCs) failure to correctly research the market and assess demand resulting in poor planning and a failure to implement their own policies.

Consequently, and as a direct result the uptake of new units within (EFSP) was substantially less than expected by the Council. In response the Council made a commercial decision to fill the unallocated retail units at the new retail park with any business that they could attract offering massive discounts on rents. This has caused unplanned business to spring up in the (EFSP) in direct competition with existing long established local traders. In some cases these new business in the (EFSP) have been given three years free rent as an incentive to take on an empty unit in (EFSP) .

From the very beginning of the process various local groups and Local Councillors from both the Town and District Councils have expressed concern and have objected to the (EFRP) and the possible negative effect upon the existing retail trade in the local area. (EFDC) proceeded without due diligence or regard to existing retail outlets in the established high streets in Loughton and Debden Broadway this is now causing some of the outlets there to suffer and or close.

There is also evidence to show that Retailers in Debden Broadway are suffering as a direct result of the (EFDC) failure to correctly research and implement a balanced parking policy in the Loughton area.

The (EFDC) policies their research and implementation are flawed and are all taken forward into the Submission Version of the Local Plan. The actions of (EFDC) have forced a decline in trade which will have a negative impact on the prosperity of the area which is already one of the most deprived in the district. (EFDC) call this their plan for regeneration of Debden Broadway, the same flawed planning and Policies used to justify the (EFSP) are being applied to the retail units located at the site of the former Sir Winston Churchill Public House now known as the Landmark Building.

Additional failures of (EFDC) policy have been the availability of parking within retail areas for example. Shoppers can pay up to £3.80 for a 3 hour stay in Debden Broadway and other Loughton area Retail cars parks, except 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 and in contravention of (EFDC) current policy on off street parking.

Unless there are equally favourable parking opportunities in all of the Debden Broadway/Loughton retail areas and a holistic view of their management undertaken only the (EFSP) will remain successful.

The policy here has not been positively prepared and successfully implemented.

#### **LOU R5 (Jessel Green).**

The Council has failed to carry out a proper examination of the site and define District Open Land. furthermore it has also failed to demonstrate that it has applied its own selection process it itself has laid down in the Plan - the "sequential test" - in a fair or logical manner.

Development of the site will remove open space from public use and substantially reduce open space within the settlement contrary to its own policy SP2 a contradiction.

The Council has ignored a vast weight of public response, and of the views of Local District and Town Cllrs, across the whole period of the preparation of the Plan. The council deliberately stalled the application by Loughton town council to define LOUR5 Jessel Green as a village Green although this green is a much used and loved centre of the Loughton/Debden community. The council has unfairly pushed forward with LOU R5 solely on the basis that its owns the site and it can form part

of its first five year masterplan delivery.

The Council has also made changes to the way in which Local Planning sub committees rules impact how applications are dealt with, thus effectively removing any hope of saving this wonderful Green open Space. This blatant manoeuvring and arbitrary stance by the Council illustrates that the Council has not approached this site with an open mind and is contradictory as the Plan itself provides for open space to be valued for its recreational and other benefits. Under Policy SP7 the Council talk grandly about maintaining, improving and increasing the “green and blue infrastructure” of the District, and in the “Vision for Loughton” they talk about minimising further recreational pressure.

The Council’s failure to respect Policy SP3, Policy DM5.

Inclusion of LOU R5 in the local plan would be against the above policy.

SP3 Provides for the extension and enhancement of generous, green space provision to deliver strong local, cultural, recreational and social areas.

DM5 Enhancement of existing green infrastructure not its destruction.

The Council has failed to produce any justification under Policy DM6 for including site LOU R5

In Conclusion The submission version of the Local Plan is not positively prepared, justified, effective or consistent with national policy. It fails to state how effective services are to be secured. Unless there is a clear mechanism for doing so, the provisions of the Plan fail to be positively prepared, nor will the Plan be effective.

I wish to participate in the hearings because of my local knowledge (55 years) - Because of the Council’s failure to take proper action in respect of the views expressed in public consultations or in feedback from District and Town Cllrs of which

Kind Regards

Chris Roberts