

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	Christopher	
Last Name	Davy	
Job Title (where relevant)	Technical Director	
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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? 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.**

In respect to the allocation of Jessel Green, site LOU.R5 for a housing development, the plan is unsound, as non-compliant with NPF 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 NPF 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: Chris Davy Date: 15/01/2018

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