

**EPPING FOREST DISTRICT COUNCIL  
LOCAL PLAN SUBMISSION 2017**

**Objections and Comments**

I shall begin my comments by saying this Plan is not based on local needs but on a government imposed notional number of houses, 11,400 to be built in the District otherwise a further 9,000 houses will be imposed upon us. I don't know if this is legal but it is certainly unsound and it would be an interesting exercise to see where government could place a further 9,000 houses in the district.

**Housing**

Looking at Loughton, the town in which I live, it is not possible to accommodate the allocated 1,021 new homes for these reasons. Historically, Loughton is bound by Epping Forest, an SSSI, on the west and north sides, Roding Valley, also an SSSI and flood plain, and the last remaining ancient water meadows in Essex, on the east, with south Loughton having a small amount of Green Belt separating it and Buckhurst Hill communities from coalescing. All available land has been built on over the years.

Over 400 acres of agricultural land were taken to build homes in the 1940's-1950's, the Debden estate, which was built on Garden Town lines. Since then land from schools and their playing fields has been sold, gardens of some existing houses built on, garages demolished and replaced by housing and any space that can be found, has been found and developed in the town.

To accommodate the extra housing in Loughton, Epping Forest District Council (EFDC) is now proposing to change not only the original intention of Debden estate, but to remove most of the main green space at its heart, Jessel Green (LOU.R5) which is contrary to its intention in the Plan to increase green space and provide it in new developments. This green is used by the local community for children to play sports safely, dog walkers and community outdoor events. It was a designated Open Space in a previous Plan to safeguard it.

This proposal fails the government's National Planning Policy Framework (NPPF) on four counts;

it is not "...empowering local people to shape their surroundings, with succinct local and neighbourhood plans ...;

The majority of local public opinion is against building on this site.

it has not ..."but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;

Removing a well used community green space which is a safe place to use does not

enhance or improve the places in which people live.  
it does not “contribute to conserving and enhancing the natural environment and reducing pollution”;

Building on open, what was protected green space, does not contribute to conserving and enhancing the natural environment.

it has not “encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value”.

EFDC did have a large brown field site available to it, as it is the owner of what was previously called Debden Industrial Estate but they have recently chosen to build shops on it and now call it Epping Forest Shopping Park.

Another site being put forward is Loughton Underground car park (LOU.R1). Station Approach was adopted by EFDC some years ago as an important gateway to Loughton and Epping Forest (a 15 minute walk away) by its residents and visitors who alight at this station. The station building itself is Grade II listed.

The effect of building homes here on this site would have a detrimental effect on the station building and be a blot on this gateway to the town. It is not disclosed how car parking will be replaced either during building works or when completed. If basement parking is envisaged, this type of parking has been seen to increase crime and be detrimental to the safety of users. The roads surrounding the station already have parking restrictions in force to prevent commuter parking and it is difficult to see where else cars can park. Commuter parking currently extends up to nearly 1 mile away from the station, bordering Epping Forest.

This is against another core principle of the NPPF which says the Local Plan should “take account of the different roles and character of different areas, promoting the vitality of our man urban areas”.

Borders Lane playing fields (LOU.R4) were attached to Epping Forest School and the last remaining piece of land in the town designated for education purposes. EFDC lifted the covenant and now houses are being put forward for this site. There is no other land available for a new school or schools in the town which would be required if these developments go ahead.

The trend of house building currently in the town is either for flats, which is changing the existing townscape or large executive, out of the drawer, houses that ignore their setting and do nothing to meet local needs but are a magnet for people migrating from London. A demand that can never be fulfilled. In fact the proposed new housing in Loughton is for incoming migration from London and not based on current local needs. There is little scope for affordable housing unless the Council adopts a strong stance with developers which it hasn't up until the present time.

Consequently, the town will no longer be a suburb but become urban with a deterioration in the townscape which is supposed to be protected.

Local people have not been involved with EFDC to discuss local housing needs and their views on the Draft Local Plan have been ignored.

This does not accord with the NPPF which says. "a social role – supporting strong, vibrant and healthy communities providing the supply of housing required to meet the needs of present and future generations".

So, are the needs of the local population likely to be met with the new housing proposals? It looks very unlikely and in fact will stimulate incoming populations from London whilst our future local population will be forced to move away. For the reasons stated above, I believe this makes the Submission unsound.

### **Infrastructure**

There are no definite plans for the amount of infrastructure that would be required, not only to deal with extra housing, but to meet current needs whether schools, doctor surgeries, health facilities etc. The current shortage of funding within local government and government does not bode well for the infrastructure needs to be met.

### **Education**

I can confirm from personal experience that Essex County Council's (ECC) strategies for education in Loughton have been abysmal as they only rely on live births. They do not keep an accurate check on the child population in the town, completely missing the point that Debden estate, which houses 10,000 people (one-third of Loughton's population), and family accommodation, at one point in time will produce another generation of children requiring school places. Neither do they look at social trends such as when women decide to have another child at a later stage in their life. Nor do they see that Loughton housing is expensive and people often move in with school aged children. This has resulted in the selling off of three secondary schools only later to panic buy a small empty temporary school costing £1,000,000 administered by another school 5 miles away while they waited for a new school to be built.

Primary schools fair no better when belatedly ECC realized a couple of years ago that there were not enough school places, they hastily erected an additional building adjoining a Victorian school to increase it to 600 pupils. In the school's Ofsted Report of 2013, they described the school as large then and that was before the extra building and increase in children. The playground has been reduced drastically over the years, with no green space and not one staff car parking space causing parking and traffic saturation in the local road network. The only response from ECC is "that is what happens when you live near a school". The school has extended its hours of operation from 8am – 5.30pm for school clubs causing

problems for local residents to park within several roads of where they live.

Added to the local population of children, others are being accepted from Redbridge and Hertfordshire, some due to ECC's policy of siblings can attend the same school even if the family have moved to a different county.

There is no confidence that ECC can keep accurate track pupil numbers and put in place timely strategies to deal with them.

### **Transport**

Apart from the Central line underground to London, which is full to capacity and cannot be improved, public transport is limited in its north-south destinations with no east-west transport at all. We, therefore, have a large car owning community which makes a mockery of the Plan not to provide car parking on the proposed new housing sites and to rely on public transport. EFDC's argument is that if people live near a bus stop, they do not require a car parking space does not translate into planning conditions precluding people to own a car in the new houses so they realize this is not tenable yet make no provision. Bus services are being eroded all the time, the latest being the 167 which is now withdrawn from the majority of Loughton residents.

Traffic congestion is a serious problem in Loughton as it can take 15 minutes to drive from one end of the High Road to the other with five sets of red lights to negotiate. This continual stop-start is one of the main causes of air pollution. Our High Road was re-classified by ECC to the A121 as the Epping New Road was down-graded from A11 to B1393 as the car pollution was affecting the trees in Epping Forest. As it is a main distributor road, more traffic uses the High Road including HGV's from Europe, in excess of 19,000 per day which are mainly during day time. Air quality is, therefore, a great concern but does not seem to be monitored. If the air quality was affecting the trees, one wonders what it is doing to local residents. The High Road which is the main town centre, is narrow with only one lane of traffic going in each direction; it has on-street parking and delivery bays with buildings of several storeys high each side so it takes longer for the polluted air to escape. There are a high proportion of 4 x 4 vehicles in the town, mainly diesel, which add to the pollution.

Parking in local roads is a major concern with the only option being provided is to have Residents Permits and now more and more residential roads are clamouring for these.

We cannot have confidence in a Plan that is unable to provide firm commitments for the necessary infrastructure required, indeed, it cannot maintain or improve existing requirements and would not meet the core principle of "contribute to conserving and enhancing the natural environment and reducing pollution".

### **Loughton Town Centre**

I have not seen any evidence of an EFDC initiative to protect the town centre for

essential shopping. In fact previous safeguards that were put in place on primary and secondary frontages have now disappeared necessitating people to either drive out elsewhere for shopping other than food, or, order online and have deliveries made to their homes causing more traffic movements in narrow roads already saturated with parking and traffic.

As mentioned previously, the newly opened Epping Forest Shopping Park brownfield site could have been used for housing as we are just 7 stops away from visiting Westfield Stratford City, a large shopping centre at Stratford which would encourage use of public transport instead of car journies. Loughton is situated about 15 minutes drive from the Brookfield Shopping Park at Cheshunt, which according to the Plan, is going to be enlarged. In having built the shops in Langston Road, EFDC have jeopardised their own Debden Broadway shops as there is no link between the two.

### **Conclusion**

It is disappointing to see safeguards that were put in place to protect our townscape, green spaces and shopping centres are to be deleted from the new Local Plan against residents' wishes. Our town will change from a pleasant suburb to another crammed, traffic choked urban area which by 2033 will be unrecognizable from today if the Plan goes ahead.