



Epping Forest
District Council

www.eppingforestdc.gov.uk



Representation form for Submission Version of the Epping Forest District Local Plan 2011-2033 (Regulation 19 publication)

This form should be used to make representations on the Submission Version of the Epping Forest District Local Plan which has been published. Please complete and return by 29 January 2018 at 5pm. An electronic version of the form is available at <http://www.efdclocalplan.org/>

Please refer to the guidance notes available before completing this form.

Please return any representations to: Planning Policy, Epping Forest District Council, Civic Offices, 323 High Street, Epping, Essex, CM16 4BZ

Or email them to: LDFconsult@eppingforestdc.gov.uk

BY 5pm on 29 January 2018

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Please attach any documents you wish to submit with your representation

Part A

1. Are you making this representation as? (Please tick as appropriate)

a) Resident or Member of the General Public ☐ or

b) Statutory Consultee, Local Authority or Town and Parish Council ☐ or

c) Landowner ☐ or

d) Agent ☒

Other organisation (please specify) ✓

LOUGHTON SELF DRIVE LTD
STATION APPROACH DERDEN
LOUGHTON, ESSEX, IG10 3TG

December 2017

2. Personal Details

3. Agent's Details (if applicable)

Title	MR	
First Name	JONATHAN	
Last Name	HAWES	
Job Title (where relevant)	DIRECTOR	
Organisation (where relevant)	LOUGHTON SELF DRIVE LTD	
Address Line 1	STATION APPROACH	
Line 2	DERDEN	
Line 3	LOUGHTON	
Line 4	ESSEX	
Post Code	IG10 3TG	
Telephone Number	020 8508 0888	
E-mail Address	info@loughton-selfdrive.co.uk	

Part B – If necessary please complete a separate Part B form for each representation

4. To which part of the Submission Version of the Local Plan does this representation relate?
(Please specify where appropriate)

Paragraph Policy Policies Map

Site Reference Settlement

5. Do you consider this part of the Submission Version of the Local Plan:
*Please refer to the Guidance notes for an explanation of terms

- a) Is Legally compliant Yes ☒ No ☐
- b) Sound Yes ☐ No ☒

If no, then which of the soundness test(s) does it fail*

Positively prepared ☒ Effective ☐

Justified ☐ Consistent with national policy ☒

- c) Complies with the duty to co-operate Yes ☒ No ☐

6. Please give details 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. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments

SEE ATTACHED

(Continue on a separate sheet if necessary)

Grounds for Representation

Site Ref: LOU.R2

Any positively prepared plan would have accurately assessed the existing use of the proposed site.

Reference to the site at Debden Underground Station as **"this site is a car park"** indicates little or no knowledge of the location and highlights the fact that there has been no meaningful engagement or collaboration. Had the author of the Plan fulfilled their statutory obligation they would have found the site referred to accommodates a large business premises. Loughton Self Drive Ltd has occupied the site since 1994 and currently operates approximately 100 vehicles from the premises. In addition to vehicle activity, evidence of the business operating from the location, is confirmed by a significant office building, storage facilities and other buildings associated with the operation of a large scale vehicle hire business.

The economic value of the business to the local community is clearly demonstrated by an annual turnover in excess of £1 million and sizeable business rates contributions. In addition, with one exception, the 10 current employees are all residents within the Epping Forest District area.

This failure to accurately assess the site, or intentionally ignore our existence, shows a distinct lack of preparation, due diligence and total disregard to the National Planning Policy Framework guidelines for Plan-Making which clearly states... **'Early and meaningful engagement and collaboration with neighbourhoods, local organisations and business is essential'**. Paragraph 70 of the NPPF states that **'planning policies and decisions should: guard against the unnecessary loss of valued facilities and services...and ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community'**.

We have received zero contact, collaboration, discussions regarding the proposed plans or the possibility of us co-existing within a proposed new development. This is despite the fact that the proposed plans state... **'Provision should be made on site for car clubs...'** Loughton Self Drive already exists on the proposed site providing safe, sustainable and affordable road transport to consumers and businesses alike, offering a full range of low emission and ultra low emission cars and Euro 5 & 6 compliant commercials. There can only have been positive benefit in incorporating our services into any new plans and avoiding the need for major traffic infrastructure, encouraging lower car use, reducing high emission vehicles and protecting and exploiting opportunities for the use of sustainable transport modes for the movement of goods or people, all consistent with the National Planning Policy Framework.

I believe I have demonstrated the proposed plan confirms a disregard for a local business which is a significant contributor to the economic and social fabric of the area. The apparent absence of compliance with the guidance contained in the NPPF challenges the integrity of the Plan in its current form. Support for such a contention

can be found in paragraph 152 of the NPPF which includes the following overarching policy advice...'**Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate**'. Any continuance of the proposed plans in their current format would have a devastating effect and cause significant economic harm to Loughton Self Drive Ltd.

Continuance of the Site Plan with disregard for national guidance in such a perfunctory manner renders the plan indefensible and liable to successful statutory challenge. As Managing Director of Loughton Self drive Ltd I would welcome the opportunity to engage with the author of the Local Plan so that the company can continue to be a valued contributor to the social and economic development of the area. If the site is retained for development under the existing plans, then any development proposals must include provision for the relocation of Loughton Self Drive Ltd.

7. Please set out what change(s) you consider necessary to make the Submission Version of the 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 Submission Version of 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.

SEE ATTACHED

(Continue on a separate sheet if necessary)

8. 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 the hearings

☒

Yes, I wish to participate at the hearings

7. Suggested Changes to Submission Version of the Local Plan

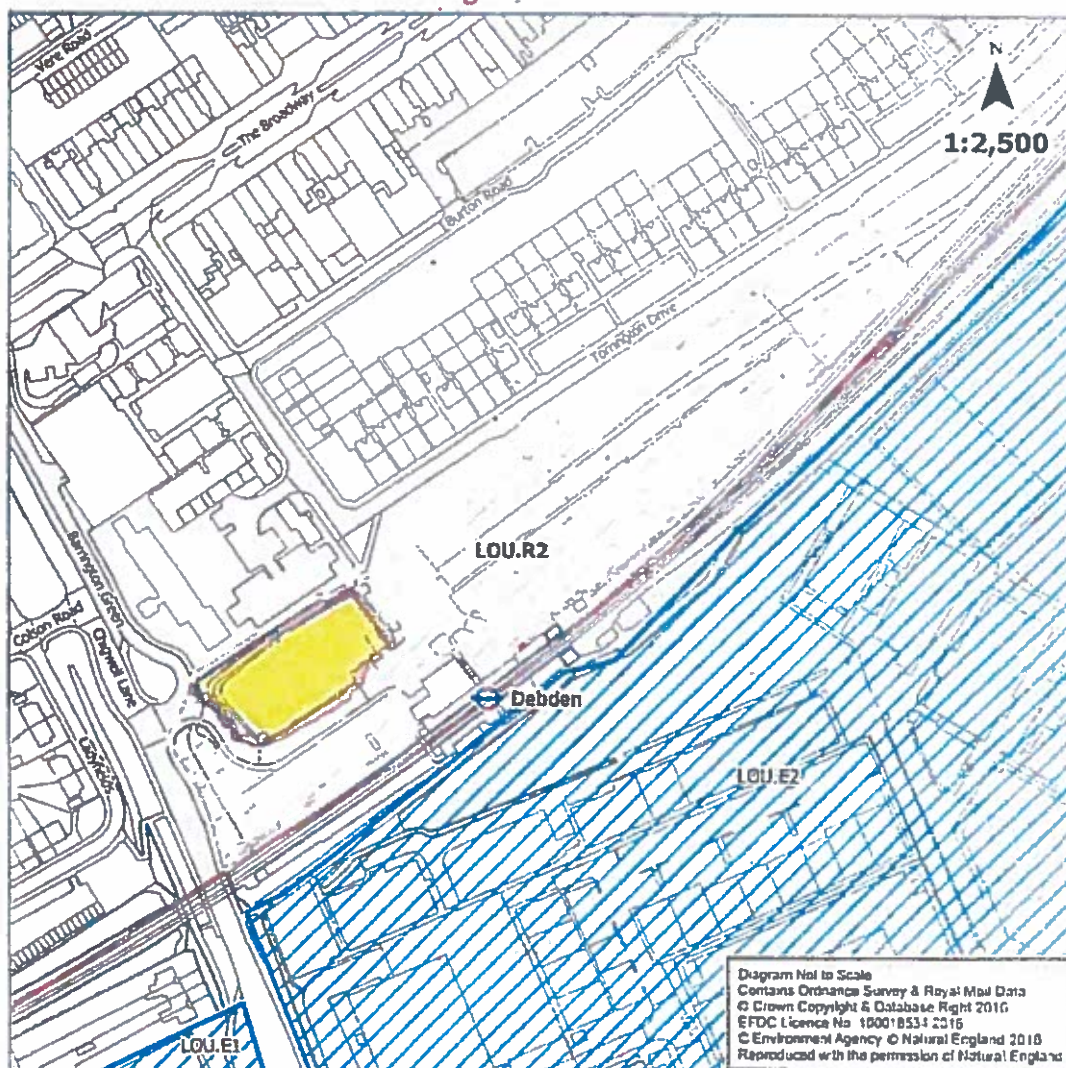
Site Ref: LOU.R2

To make the plan sound and consistent with the National Planning Policy Framework we would propose Loughton Self Drive Ltd remaining in situ, co-existing with any revised residential development (see highlighted section in enclosed LOU.R2 map for our existing site).

Not only would this retain an established local service provider, as per NPPF guidelines, but also preserve jobs for existing staff, thus avoiding significant adverse economic impact on a local business.

Incorporating Loughton Self Drive into the proposed plans would give an on-site low emission car club/hire option for new residents, as per the Council's Development Requirements for the site. It also deals with the restricted parking facilities in the new development plans and supports the NPPF guidelines on promoting sustainable transport and reducing greenhouse gas emissions with the use of low and ultra low emission vehicles.

LOU.R2 Debden London Underground Car Park



Site Address: Chigwell Lane, Loughton, Essex, IG10 3

Settlement: Loughton		Proposed Use: Residential
Size (Ha)	1.66	Site Description: The site is a car park. It is bounded by the London Underground Central Line to the south, Chigwell Lane to the west, Torrington Drive to the north and greenfield land/scrub to the east.
Indicative Development Area (Ha)	1.66	
Indicative Net Density (DpH)	129	
Approximate Net Capacity (Dwellings)	192	

When bringing forward development proposals, regard should be had to the Local Plan as a whole. This includes any relevant policies as well as any site specific requirements provided in this appendix. Planning applications should also comply with the Council's approved Validation Requirements.

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9. If you wish to participate at the hearings, please outline why you consider this to be necessary:

HAVING BEEN OVERLOOKED + IGNORED UP UNTIL
THIS STAGE OF PROCEEDINGS WE FEEL PARTICIPATION
MAY BE THE ONLY WAY WE GET HEARD.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

10. Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination (Please tick)



Yes



No

11. Have you attached any documents with this representation?



Yes



No

Signature:



Date:

25-1-18