

## EPPING FOREST DISTRICT COUNCIL LOCAL PLAN

### HEARING AGENDA – WEEK 7, MATTER 15 ISSUE 2 (LOUGHTON) – LATEST MIQs

#### RESPONSE OF LOUGHTON TOWN COUNCIL

##### **General Matters:**

Current position concerning the effect of development proposed in Loughton on Junction 5 of the M11, including stance of Highways England.

1. As set out in paragraph 29 of LTC's Hearing Statement, a scheme to reduce capacity on the A1168 at the point where the M11 off-slip road meets the A1168 has been proposed. A copy of the Call-in document in the names of the three Councillors for Loughton and Chigwell is at Appendix A. In effect, the proposal is to reduce the width of the north bound carriageway with the aim of eliminating conflict between the motorway off-slip road traffic and the north bound A1168 traffic.

##### **LOU.R5 (Jessel Green Masterplan Area):**

Findings of the Open Space Strategy, for amenity greenspace and other types of open space, including parks. Would alternative open spaces be easily accessible and fulfil a similar function?

Open Space Strategy (EB703) – (reference to paragraphs are to those in the OSS.)

2. LTC accepts that Jessel Green is correctly classified as Amenity Greenspace in the OSS study categories at paragraph 5.1.
3. In Appendix 1 of the OSS, Jessel Green is given a qualitative score of 55%, qualitatively one of the lowest for Amenity Greenspace in Loughton. In the submission of LTC that cannot be right. As the Inspector will no doubt hear, Jessel

Green is well used by residents from Debden Estate and further afield and by schoolchildren from the local schools<sup>1</sup> for a wide variety of activities, including communal activities. LTC suggested in its Hearing Statement<sup>2</sup> that the low score is not appropriate and is certainly not reflective of the very high regard in which Jessel Green is held in the neighbourhood. LTC has recently sought the detailed breakdown of that score from the Council and it is hoped that such information will be before the hearing on Tuesday.

4. The score appears to have been based solely on the quality standards set out at paragraph 3.21. In the submission of LTC, while those standards may well be helpful in other circumstances and for different evaluations, they are extremely generalised and of limited assistance in reflecting the true value of an informal area of open space such as Jessel Green. Thus, Jessel Green has little equipment, no formal (or informal) entrances, no heritage or historical information boards, no special landscaping, no lighting (other than street lighting), no roadways or dedicated footpaths through the site and few ancillary facilities. In those circumstances, it is likely to have scored badly under such headings as “welcome”, “security and safety”, “landscaping” and “ancillary facilities”.

#### Amenity Greenspace.

5. At paragraph 7.11, it is said that *“Loughton has adequate levels of Amenity Greenspace which are likely to be maintained until the end of the plan period”*. That statement is presumably based on the figures in Appendix 2.
  
6. Appendix 2 is difficult to understand until the reader appreciates that the headings do not correspond with the columns beneath. Translated the table means:

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<sup>1</sup> Hereward Junior, Davenant Foundation School and St John Fisher Primary.

<sup>2</sup> At paragraph 17.

2017:

Requirement: 19.53 ha (32,553 x 0.6<sup>3</sup>)

Provision: 25.61 ha

Oversupply: 6.08 ha

2033:

Requirement: 21.57 ha (35,950 x 0.6)

Provision: 25.61 ha

Oversupply: 4.04 ha

7. The criticisms of Appendix 2 are as follows:

- (a) The 2033 population figure appears to be a simple population projection based upon the 2016 population figure and taking no account of the increased population arising from the projected housing development. That by itself may not be critical, but must be seen in the context of the further criticisms.
  
- (b) The 2017 provision figure appears to be based on the total of the Loughton Amenity Greenspace shown in Appendix 1, although no areas are given there and similarly the breakdown of the qualitative scores are not given. The two substantial areas of Amenity Greenspace are Jessel Green comprising 8.02 ha and Colson Road<sup>4</sup> (without the final "s") comprising 4.78 ha. Both areas are allocated for housing development in the Plan. It follows that those two areas comprise about 50% of the present provision in Loughton. The other 17 sites, together comprising the remaining provision, are mostly considerably smaller in size and/or adjacent to rivers or main roads, and therefore cannot be used for public recreation, especially for ball games.

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<sup>3</sup> See paragraph 15.3 of OSS.

<sup>4</sup> Colson Road is LOU.R4 Borders Lane Playing Fields in the Plan.

- (c) For the Inspector's assistance, LTC has itself carried out an assessment of the listed sites which can be found at Appendix B annexed to this Response, despite some confusion over exactly which site the consultants meant (for instance the site described as Witham Close is actually inaccessible from that street.) LTC invites the Inspector to conclude that most of the Appendix 1 sites (excluding Jessel Green and Colson Road) are in the nature of roadside or estate greens, and none of them are really suitable, being close to roads, streams, parked cars, and houses. Most of these areas are not of the same stature as Jessel Green and the larger areas do not provide adequate open space amenity, being typically boggy or hilly.
- (d) While the 2017 provision figure naturally does not include the proposed housing development at R4 or R5, the 2033 figure should clearly do so, but does not. If the land-take from Jessel Green (4.01 ha) and from Borders Lane (2.39 ha) is subtracted from the present provision figure of 25.61 ha, there is a resulting 2033 deficit of 2.36 ha.
- (e) Thus, in the submission of LTC, the OSS and in particular Appendix 2 is misleading in its suggestion that Loughton will have adequate levels of Amenity Greenspace until the end of the Plan period. The true picture is that the development of R4 and R5 will inevitably lead to a deficit.

8. At paragraph 89 of its Hearing Statement, the Council suggested that only half Jessel Green would be developed and the other half would be provided with enhanced public open space and that, in addition, residents within the vicinity of Jessel Green would be able to access Hillyfields and Home Mead. LTC responds as follows:

- (a) It is no answer to the objectors to say that only half of Jessel Green is to be taken for development. It is inappropriate for **any** part of this valuable and well regarded open space be developed. As for enhancement, no details have been given but, in any event, very little enhancement is required.
  
- (b) The walking distance from Jessel Green to Hillyfields is approximately 650 m, in excess of the 480m considered appropriate for Amenity Greenspace set out in the Accessibility Standards given in Table 3.2. In addition, as its name suggests, Hillyfields is hilly: see the general comments in Appendix B.
  
- (c) The walking distance from Jessel Green to Home Mead is approximately 550m, again in excess of the 480m standard. It is not defined as Amenity Greenspace but as Natural and Semi-Natural Greenspace. It is in fact a local nature reserve. It is relatively inaccessible from the east – in other words, from the Jessel Green direction.

9. In the Submission of LTC, Jessel Green should be designated as Local Green Space. It fulfils all the criteria set out in paragraph 77 of the NPPF (2012 ed). There is simply no justification for limiting LGS to areas of less than 2.5 ha, as the Council seeks to do in its document ED53.

### Public Parks and Gardens

10. It is common ground that there is no public park in Loughton.<sup>5</sup> The present deficiency is said to be 26.08 ha and the 2033 deficiency to be 28.8 ha.<sup>6</sup> The IDP

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<sup>5</sup> See paragraph 8.7 and Appendix 1.

<sup>6</sup> See Appendix 2.

(EB1101B) at reference LOU25<sup>7</sup> requires the essential provision of 28.8 ha of open space for public parks and gardens at a cost of £7.5M.

11. The suggestion at paragraph 8.2 is that Roding Valley Recreation Ground could be upgraded to *“a true public park to cover the current and future needs of the community in Loughton.”* The problems with that suggestion are:
- (a) The distance between the Roding Valley Recreation Ground and Loughton is approximately 1k measured from their closest points as against 710m considered appropriate for Public Parks set out in the Accessibility Standards given in Table 3.2.
  - (b) It is relatively difficult for Loughton residents to access Roding Valley Recreation Ground, requiring the crossing of a railway line. Access by foot with a family, including children, would not be particularly easy.
  - (c) It abuts the river and therefore may not be safe for children.
  - (d) The requirement for the provision of open space for public parks in the IDP does not appear from the “notes” column to be the same as the suggested upgrading of the Roding Valley Recreation Ground.

#### Facilities for Children

12. Appendix 2 shows a present deficit of 7.8 ha for children’s facilities in Loughton and a future deficit of 8.66 ha. These are considerable areas.

13. The only suggestions for making good those deficits are the upgrading of Roding Valley Recreation Ground<sup>8</sup> and upgrading sites at Westall Road and Rectory Lane.<sup>9</sup> The problem with the upgrading of the Roding Valley Recreation Ground is distance (1k as against the much lesser distances recommended in Table 3.2 for LAPs and LEAPs). The problem with upgrading the sites at Westall Road and Rectory Lane is that they will not make good the considerable deficit identified. There is presently a children's playground on Jessel Green.

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<sup>8</sup> Paragraph 9.12  
<sup>9</sup> Recommendation 18.