

Statement re Epping Forest District Council Local Plan Examination Matter 15 issue 2 P2 Loughton hearing 11th, June 2019. Related to Reg. 20 Rep. 19RES0422

P2 Q 1 Re M11 Junction 5

By about 7 a.m. each weekday traffic tails back from J4 at South Woodford to J5. It functions but new development would have a negative effect. Problems worsened around J5 since the opening of the poorly placed Langston Road retail park. In conception it was mooted by EFDC for fashion outlets that would not compete with shops in Debden Broadway. That was forgotten and the Council let to budget outlets Aldi and Home Bargains which attract numerous customers and cars. Since fully occupied in 2018 it frequently causes congestion. That spreads to local roads within a radius of about 800 m and blocks the access road from the Ambulance station into Rectory Lane. It is particularly disruptive to businesses further along Langston Road. EFDC acknowledge this in the attached email correspondence.

P2 Q 3 Re LOU.R1 & R2

LUL promoted their car park sites at all stations in the District that have one. All are in the LP. The whole district would be impacted but Loughton, with the second station at Debden, would be significantly affected.

The scene at all stations can be messy in peak hours. It untangles but building on car parks would increase congestion with new residents living over them and in the surrounds. Station car park entrances are by nature busy. Retail Park traffic also affects Debden station entrance. Due to traffic volume in peak hours the slightest incident quickly causes disruption. In that light, development of Debden station car park, so close to the Retail Park, is ill conceived.

In neighbouring Redbridge the local plan includes car park sites at Ilford, South Woodford, Newbury Park, Woodford, Fairlop, Hainault, Wanstead and Snaresbrook stations. In combination It is a recipe for chaos. The pressure on capacity down the line with thousands more homes planned in Redbridge and Waltham Forest does not appear to have been considered.

On the 25th, October 2021 the ULEZ perimeter extends to the North and South circular roads. Inevitably commuters wanting to avoid the charge will park and ride from stations outside the zone. Have the Council and LUL considered that extra traffic and passengers will use local stations?

A station car park is a poor location for a home. It is noisy. The door alert can be heard clearly, screechy wheels, loudspeaker announcements at any time. Trains start from Epping at 5.10 and end about midnight. The service to Loughton runs all night on Fridays and Saturdays so there would be scant respite for nearby residents. At Debden the maximum distance homes could be from the rail line is 35 m. They would be about 425 m from the M11 and its noise and pollution. These sites would also have traffic/passenger noise and fumes from cars parking. No one who proposed these sites would live on one.

P2 Q 4 RE LOU.R5 Jessel Green

a. i) Loughton Residents Association will provide a map of the original concept for the estate designating Jessel Green (JG) as open space. Kindly note numerous infill developments since.

a. ii) Any development will devastate the appearance and ambience of JG. It is a cherished, well used community asset encircled by homes and should never have been in their plan.

b. No, by any standard. No appropriate alternative suitable space exists in Loughton to cover the range of activities that take place on JG. The point of a space is that it is space. It engenders a sense of freedom and wellbeing. It is a safe area for children, near home, that other spaces do not provide. Debden is a relatively low income area and JG is essential for families needing a place for low or no cost activities.

A mitigation strategy for the SAC is in process. The CoEF and Natural England have intimated that SANGS may be required to offset the effects of new development. JG is ideal for that purpose.

My reg 20 Rep. detailed local and national policies related to green space provision that EFDC disregard in pursuit of JG. I support these representations related to the usage of JG and why it should be preserved.

Loughton Town Council	19STAT0019
Loughton Residents Association	19OTH0033
Save Jessel Green campaign	19OTH0053 (Neil Bartlett)
Essex Playing Fields Association	19OTH0067
Campaign For the Protection of Rural England	19OTH0035 Line 3 (Patricia Moxey)
Restore Community Church	19RES0082
Open Spaces Society	19OTH0053 (Features in SJG LINE 8)
Natural England	19STAT0027
Friends of Epping Forest	19OTH0055 (Judy Adams)
Conservators of Epping Forest.	19STAT0035

(also their 2016 Reg 18 Comments specifically disagreed with inclusion of JG.)

The SVLP makes references to climate change but is vague on detail related to shade and green space. The attached extract is from a Commons White paper on Climate change and need for green space and shade published, published: 26th, July 2018, and should be considered in relation to JG.

c. No. The allocation appears to have been made in spite of the Town/Village Green application. The Council should support the designation but seem desperate to sell JG before legal issues are resolved.

d. On the 26th, March re matter 16 DM6 Open Space, Ms Blom-Cooper acknowledged JG is a controversial issue and is why there is no Masterplan. That suggests the Council lacks confidence in their evidence. Events suggest methods to justify their commitment are questionable.

Of crucial concern is their use of the CoEF 2016 comments which fundamentally challenges integrity.

My reg. 20 rep. detailed how they were incontrovertibly misrepresented to exclude sites in Theydon Bois but specific disagreement to JG, related to recreational pressure on the SAC, was ignored. I cite this purely to compare how that evidence was misused.

If not a mistake that the Council will correct, there is a question of motivation and suspicion that site selection of JG was predetermined which needs explanation.

The Procedural Practice in the Examination of Local Plans section 1 Pre Submission includes this paragraph:

1.7. LPAs need to be clear about what conclusions they have come to from the range of evidence available and how they have made choices, based on the evidence. **The plan must not contain assertions of fact that are not supported by the evidence.** Similarly, the evidence should not be collected retrospectively in an attempt to justify the plan.

On the 11th, December 2017 in an audio interview, Cllr. Chris Whitbread specifically mentioned “representations” from the CoEF, related to exclusion of the Theydon Bois sites. On the 14th, December 2017, before the vote to adopt the plan, Cllr. J. Phillip said, “we had a clear objection to development proposed East of the Tube Line from the Corporation of London as guardians of Epping Forest”. Cllr. Sue Jones later referred to a “strong objection from the Corporation of London”. Ms. Blom-Cooper cited in that meeting “an objection” from the CoEF. Her comments later feature in the Supperstone Judgement.

All “on message” but none state what this representation or objection is. My FOI request included with my Reg 20. Rep. ascertained that the only evidence from the CoEF were their 2016 comments at the Reg 18 stage. The statements made about it were incorrect. There was no clear objection, that is an invention and an “assertion of fact that is not supported by the evidence”.

EB805P was published in March 2018 by Arup. It notes for sites SR-0026B+C that the CoEF “raised concerns”, no mention of a clear objection. It is curious that the Council and Arup have differing views about the CoEF document. Strangely, Arup, Council members and the officer who referenced it, all failed to note express disagreement that the CoEF had with the allocation for JG.

The 14/12/2017 meeting is available on webcast. The disparity was raised but ignored. Comparison of comments made from 22 minutes until 2.27 with the Conservators Reg 18 submission are informative. Particularly relevant is section 2.13:19 - 2.15: 20. Cllr. Phillip was asked about the “clear objection”. His response failed to give any detail. An amendment to remove JG from the LP was defeated. None of the 29 members (29 against, 18 for, 4 abstentions) who voted against the motion represented or lived in Loughton. At the time EB805P from appendix B had not been published.

e. EFDC say they listened to the community by reducing the quota. That is an unacceptable sop. JG is a feature in its entirety. The Council appear to hold the view that residents should be thankful that Rochford Green SR-0358 was removed and for the JG reduction. Neither should have featured in this process.

Ms Blom-Cooper said in an earlier hearing that open spaces in Urban areas had been chosen to reduce Green belt requirement. That argument is spurious and cannot be used to dismiss policies, consultations and other evidence. Protection of green belt does not validate inclusion of JG.

26/2 Re matter 4 Issue 4, Ms Blom-Cooper discussed green belt scores and said it was not just scores that counted but also consultation responses that had caused certain sites to be rejected. The Council only note responses when they choose. As they did for Theydon Bois sites, in the case of JG they were ignored.

To conclude

EFDC want to sell Jessel Green, TFL/LUL their Car Parks. The Local plan process is for future housing needs, not a fundraising opportunity for TFL/LUL and a Council that operates in denial and is blinkered to a community it is supposed to represent and support.

In the January 2019 HRA EB209, avoid or avoidance, appears on 26 occasions. Either mitigate or mitigation, 226 times. Damage is permissible if someone makes a contribution is an abysmal approach. Damage will be permanent, particularly for the SAC and JG, I very much doubt mitigation will be.

The issues about policies, respected opinion, consultation responses, cherry picked use of evidence and a well supported petition are clear. Understandable the Council may miss or ignore one issue but not all those. The selection of JG is tantamount to Wednesbury unreasonableness.

In terms of NPPF Para. 182, the choice of JG is not justified and not consistent with national policy thus the plan is unsound with its inclusion. I am concerned about the motivation of the Council in respect of JG and how evidence was used. They have failed to give substantive reasons to the contrary. Unfortunately the Council have made this political not the community.

May I respectfully suggest, that in terms of Jessel Green, the plan may be made sound by recommendation of a Major Modification to accord it designation appropriate to protect it for future generations. An aspiration envisaged for Epping Forest by Sir George Jessel in 1874 that is equally important now to the community in Loughton and particularly around Jessel Green.

Thank you for your time and consideration.

Mark Hickey

17th, April 2019

Extract from Commons Environmental Audit Committee White paper on Climate change and need for green space and shade. Published: 26 July 2018

90. However, the majority of local plans do not contain any strategies to reduce the urban heat island effect. The 25 Year Environment Plan outlines the Government's ambition to improve health and happiness through greening the England's towns and cities. Actions include planting one million trees in towns and cities by 2022, drawing up a national framework of green infrastructure standards, supporting local authorities to assess their provision of green space against these standards and exploring how green infrastructure commitments can be built into national planning guidance and policy. However, there is no mention of the benefits of green spaces for reducing the urban heat island effect, and protecting the population of towns and cities during heat waves. There are no national targets to increase urban green space back up to 2001 levels.

91. Green spaces have been proven to reduce the urban heat island effect, however urban green space has declined in England. The Government's commitments to green towns and cities are not measurable or target driven and do not link green spaces to urban heat island reduction. The Government should introduce an urban green infrastructure target as part of the metrics for the 25 Year Environment Plan and in the National Planning Policy Framework to ensure towns and cities are adapted to more frequent heat waves in the future. The Government should aim to increase urban green space to 2001 levels, and higher if possible. The importance of shaded spaces in urban areas should be included in the Framework's section on 'promoting healthy and safe communities', so that all local planning authorities have to demonstrate their provision of shaded spaces in the clearance process of their local plans.

Mark Hickey

From: Bruna Malone <bmalone@eppingforestdc.gov.uk>
Sent: 17 December 2018 14:45
To: Mark Hickey
Subject: RE: Re Epping Forest Retail Park. Langston Road, Loughton.

Dear Mark,

We have received your enquiry and appreciate your concerns.

EFDC and Savills are fully aware of the parking issues and they are now one of our top priorities. We are working alongside Ranger, who enforces the car park's rules and regulations, to improve its use and make it a more pleasant visit to the shoppers.

We have recently implemented a new enforcement system and parking Marshalls have been added to the team to help with the flow of the car park. The car park design is also being reviewed.

As you know any change takes time and we are hoping these measures will make the overall shopper's experience much better. And we will continue to work in making constant improvements.

Kind regards,

Bruna Malone

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From: Mark Hickey [<mailto:Mark.Hickey@thamesdiesel.co.uk>]
Sent: 10 December 2018 15:16
To: Contact Us <ContactUs@eppingforestdc.gov.uk>
Cc: Peter Dyer <Peter.Dyer@thamesdiesel.co.uk>; contact@loughtonresidents.co.uk
Subject: Re Epping Forest Retail Park. Langston Road, Loughton.

Good day,

Since the retail park has become operational, traffic congestion in Langston road has become disruptive to my companies business. What was previously a good business location is now problematic.

Deliveries and collections are frequently delayed and staff who drive to the office have problems almost every morning and evening.

The poorly designed entrance to the retail park is a significant cause. At busy times drivers seem unable to find parking spaces and long queues form with frequent tailbacks in and out of Langston Road.

Traffic backs up in both directions on Chigwell Lane. Congestion often spreads North up Chigwell Lane to Rectory lane, past the junction with Westall Road with knock on congestion at the Broadway, Borders Lane and at the entrance to Debden Station. There are also long queues in Oakwood Hill.

Apart from the disruption and inconvenience to business and the local community of major importance is potential problems for the Ambulance service operating from Rectory Lane.

Will you please consider that a major rethink of traffic management at the retail park is now necessary?

In the run up to the holiday period this situation will become worse. Will you please ensure traffic officers are placed at the retail park in the interim to manage this situation and assist drivers?

Best regards
Mark Hickey

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