

Local Plan Submission Version Response - 181120 Mr. M Benbow

It's nearly 3 years after my Reg 19 submission dated 210120 where I asked, on behalf of 1077 households in Loughton, that LOU.R5 - Jessel Green and LOU.R4 - Lucton's Field should be removed from EFDC's District Local Plan.

Residents in those 1077 households now face two large planning applications for sites LOU.R4 Borders Lane Playing Fields and LOU.R9 Land at Former Epping Forest College. My plea to the Inspector, on behalf of those Reg 18 respondees, is to ask EFDC not to exceed the $281 + 139 = 420$ homes prescribed in EFDC's Local Plan.

In addition, the Local Plan must be adjusted to reflect significant changes now apparent:

- UK Leaving the EU - Migration will be different after 2020 - it was one strong reason why people voted to leave.
- After effects of Covid-19 - there will be changes to travel and migration in the short, medium and long term.
- The inevitable deep recession after 2020.
- Damage to the Forest SAC - unless planning applications which increase numbers of people living within one mile of the SAC are refused.
- Damage to the SAC - unless planning applications which increase vehicles numbers driving near the SAC are refused.

DLP Ref ED114 - EFDC Response to Inspector on 2018 Household Projections dated 04/09/20 - 'that there is no meaningful change in the housing situation'. EFDC has given a narrow technical response to the Inspector which completely ignores the effect on Loughton and the bullet points above which will change everything after 2020 including the migration predictions. It is acknowledged from the highest levels of Government down to ordinary Loughton Residents that the next 5-10 years will be significantly different from the last 5/10 years therefore EFDC's Local Plan must be adjusted to take account of this.

An argument used for Green Belt retention is when it's gone - it's for ever. This principle applies even more to the retention and protection of the last few green spaces in Loughton.

My Regulation 19 two page submission had 4 tables which that evidenced that Loughton has:

- A significantly higher number and proportion of responses within the district.
- A significantly higher number of Council Tax payers within the district.
- A very high number of residents living within a fairly small area of the district.
- A large population living in a fairly small area that is already densely populated.
- 1077 households submitted to Reg 18 with the plea: 'please don't build on our last remaining Green Open Spaces.

In the last 40 years, 19 green open sites in the town have been in-filled and built on so there are now only a few green open areas left for the enjoyment and wellbeing of the much increased number of Loughton residents. It is much appreciated that the Inspector removed Jessel Green which should never have been included in EFDC's Draft Local Plan.

Studying DLP Ref ED114A - Objectively Assessed Needs 2018 household projections dated 04/09/20 it is clear that it needs further updating to take account of the UK leaving the EU, Covid-19 changes and the inevitable deep recession after 2020 before it can correctly inform new home building in EFDC district and especially new building in Loughton where nearly all the land has already been built on.

The DLP Examination has scrutinised every possible potential development sites in Loughton in great detail. It caused residents to exhaustively defend their cherished town environment and remaining green open spaces.

Residents in 1077 households submitted sincerely and concisely to Regulation 18 with the plea: 'please don't build on our last remaining Green Open Spaces which are so critical to our physical, mental health and general wellbeing'. We all understand new and affordable homes are needed in Epping Forest and that EFDC is under pressure from Government. A lot of new homes have already been built in Loughton in the last 30-40 years but our lovely town has reached saturation for: Road traffic, air pollution, parking spaces, Central Line capacity, school places, open spaces for exercise, recreation facilities, police enforcement and it's hard to get a doctor's appointment.

The immensity of DLP data, historical migration numbers predicted and building targets don't change the fact that in Loughton there is hardly any undeveloped land left. The planning answer cannot be to impose high-rise 4 and 5 storey blocks of flats like those in densely populated parts of London. Developers know land values in Loughton are high and profitable for them so they use high calibre planning agents to out-pace EFDC Officers to secure the absolute maximum development planning permission possible despite the effects in Loughton.

As an example: The DLP is yet to be adopted but Loughton residents are faced with the largest planning applications for 25 years on sites LOU.R4 Borders Lane Playing Fields and LOU.R9 Land at Former Epping Forest College. The college

sold these sites to Fairview Homes and EFDC working with the Quality Review Panel have encouraged over development of those sites. Planning applications EPF/0379/20 and EPF/2905/19 propose an increased number of flats - 30% and 25% more than is prescribed for each site in the Local Plan Submission Version. These applications have received $283+486 = 769$ Objections and $24+22 = 46$ Comments.

Combined totals proposed for both College sites are: $5+3 = 8$ blocks of flats mostly 5 or 4 storeys high. $281+139 = 420$ homes including 19 houses. EFDC's Local Plan Submission specifies $217+111 = 328$ homes - this is 28% more crammed into our town. In total there are $519+250 = 769$ Bedrooms but only $203+124 = 327$ car parking spaces. A one Bedroom flat will have 1 or 2 residents who may own 1 or 2 cars between them. Two and three bedroom flats will have more residents, many will work and have cars or vans. It's common sense that 769 bedrooms with 327 parking spaces is 0.43 - less than half a parking space per bedroom.

It has taken years to create a Local Plan Submission Version but at the first opportunity EFDC have encouraged an increase of 28% more homes. It would be very helpful if the Inspector signals that adherence to the LP Submission Version numbers must be followed closely or there is no point in having a Local Plan with carefully considered numbers of dwellings for each allocated site. It would be equally helpful if the Inspector guided EFDC to accept the views of 1077 Loughton residents who submitted to Reg 18 as that was 32.9% (33%) of total responses to the entire district consultation.

Attached are three photos taken in Loughton recently.