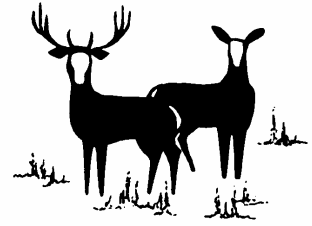


*Theydon Bois and District
Rural Preservation Society
Affiliated to the Campaign to Protect Rural England*

*Registered Charity No. 286364
Established 1943
Member of the Civic Trust*



C/o 69 Hornbeam Road
Theydon Bois, Epping
Essex CM16 7JU

The Head of Planning Services
Epping Forest District Council
Civic Offices, 323 High Street
EPPING
Essex CM16 4BZ

21st October 2010

Dear Sir,

**Attention of Stephan Solon
Re: EPF/1134/10 Land off Abridge Road (ex. Old Foresters Club), Theydon Bois.**

Proposal: The creation of a commuter car park providing 179 car parking spaces (including 13 disabled spaces), access road, access bridge, lighting, security centre, CCTV installations, landscaping and drainage works.

The Society's Committee have examined the plans accompanying this application and know the site well. The Society strongly objected to the previous application for a Car Park on this site that was subsequently refused by EFDC on the 13th March 2009 and although this application is more detailed it has no greater merit and should also be refused.

This proposal is clearly inappropriate development within the Green Belt as defined in PPG2 and Local Plan Policies GB2A & GB7A. The provision of a large car park for commuters in this location does not constitute a "Special Circumstance" whereby Green Belt legislation should be relaxed. There is no overwhelming need for additional commuter parking for the residents of Theydon Bois as the majority of homes are within easy walking distance of the station and there is adequate parking provision for the few outlying properties. The Society's view is that this latest proposed development does not comply with the above policies as the applicant has again not proved any overwhelming need or very special circumstances exist which would outweigh the substantial harm to the Green Belt from the construction of a commuter car park. Although there is greater detail in this application over the previous one, this use for the land has again not been proved and in any event the scheme would cause unacceptable harm to the character and appearance of the Green Belt, which alone should be justification for refusal.

Contrary to the views expressed in the Robert West Report (Document 2743/003/R04A) the Society believes the proposal would not reduce the demand for travel by private car as encouraged in transport planning policy at Government, Regional and Local levels. The provision of a large car park in this location would only encourage an increase in unsustainable transport by car from other locations in our district, Essex, Hertfordshire and Cambridgeshire that are already well served by public transport. This is actively discouraged in PPG13, Essex CC Transport Policy and the Transport Policies in the Local Plan. We have noted from the tax disks on cars and by talking to drivers that the majority of commuter cars being parked in and around Theydon Bois come from towns already well served by mainline rail services including Harlow,

Brentwood, Chelmsford, Bishops Stortford and Stansted. Most of these car owners are trying to access the cheaper Transport for London Underground services rather than use more local stations where ticket prices to London are significantly higher. They are actually prepared to travel further to do this. We are of the opinion that distances travelled, journey miles, congestion and carbon emissions can be expected to increase rather than be reduced if this Car Park is allowed. Transport for London has previously indicated that they do not wish to encourage increased use of the Central Line from Epping and Theydon Bois. By increasing parking provision and encouraging people onto the trains here they then become unacceptably overcrowded further down the line and they are unable at present to increase capacity. TfL commuters from Loughton Station already complain about the overcrowded trains.

To reduce their travel costs even further many of these commuters are also seeking to park for free. We have noted that on most weekdays there are spaces available in the EFDC pay and display car park in Burton Road, Debden, which is only minutes from Debden station and has relatively low parking fees. This car park is as easy to reach for commuters travelling via Abridge as the one proposed at Theydon. The recently introduced parking restrictions in the more central roads in Theydon Bois has increased problems on the uncontrolled roads further from the centre, proving that commuters are prepared to walk some distance to the station to be able to park for free, but not to pay even the relatively low fees to park nearer to a station as at Debden. Therefore traffic and uncontrolled parking in Theydon Bois can be expected to increase with the development of this Car Park. Commuters will be encouraged to come to our village seeking free parking, but knowing that they can use a fee required car park as a last resort. The provision of any commuter car parking in the district should only be part of an overall transport and road traffic strategy for the whole area.

There is no proper business plan accompanying this application. We have considerable doubts about the viability of a commercial car park in this location. With only 179 spaces, the need for high staffing levels for security, operating the electric taxis and traffic control on Abridge Road, as noted in the Robert West Report, the fees would have to be considerably higher than the present TfL pricing structure to cover the considerable development costs, ongoing maintenance and still show an operating profit. The present low £2.80 a day charge and under occupancy at Debden indicate fees that are likely to gain any acceptance with commuters. The Society cannot avoid concluding that the real motivation of the applicant here is not the development of a commercially profitable car park but the 'softening up' of this Green Belt site for more intensive and profitable development. The application notes the present land use as "Agricultural/Horticulture/Glass" and proposes a change of land use to "Assembly/Leisure". Class D2 use is very diverse including cinemas, concert halls, dance halls, bingo halls, swimming baths, gymnasiums, etc. This increases our opinion that the applicant is trying to "soften up" this Green Belt site, with a commercially unviable parking provision with the real future intention of developing other more commercially viable activities on this site once a change of use of the land to D2 has been gained. Developments of this type would normally have even less chance of qualifying as special circumstances under present Green Belt legislation if applied for directly. There can be no justification for building a commercial car park on Green Belt land that is destined to fail.

Public Footpaths 4 and 5 would be adversely affected. We can confirm that these footpaths are regularly used by our members and other ramblers, even with the present access difficulties. The ELD 'Landscape & Visual Impact Assessment' recognises the harm that would be caused (6.2.2 & 6.2.7.1) and rates the 'Receptor Sensitivity' as high. The access road would also be detrimental to the footpaths and would detract from the openness of the Green Belt and the Sidell Gibson Crouch Butler proposals do not adequately address this adverse impact.

The applicant incorrectly shows the public footpath (no.5) from the proposed car park site to the footbridge, leading to Theydon Bois station entrance, as running along the private tarmacked access road to the bottom of old Station Hill. In fact, the public footpath only runs along part of this private road and then continues alongside the Westbound platform wall, along a narrow passage, through land which belongs to London

Underground. We understand that the privately owned tarmacked road allows access for public vehicles to the Old Foresters site for sporting purposes only and that the owner of this land will not allow his road to be used for the proposed electric taxi service, which the applicant wishes to introduce to solve the problem of commuters moving in safety between the remotely sited car park to the footbridge access to Theydon Bois Station. Therefore the problems of remoteness, safety and security that were problematic in the previous application have not been overcome.

The car park in this location would require illumination to present standards as noted in the application. The 6 metre high pylons proposed to light the car park would be an intrusion into the village Dark Skies policy upheld in a number of recent cases by the Planning Inspectorate. The light spill from the large number of car headlights entering and leaving the site would also have a detrimental impact especially in winter and given the elevated ground at this point they would be particularly intrusive to the residents of Forest Drive. The WYG 'Lighting Impact Assessment' tries to suggest that the impact from the development would be minimal, but this is from a number of receptor points based on residential properties. It is even then only a computer 3D model that has many 'real world' limitations. In particular it fails to take into proper account the overall impact on the night sky. An idea of this impact though can be gauged from the comparative illustrations on pages 25- 28 of the report. Loughton Astronomical Society is at present based in Theydon Bois, chosen because its 'Dark Skies' allow the night sky to be enjoyed even in the early evening. Continuation in the enjoyment of the night sky should remain available to us all.

Following a safety audit Essex CC proposed that a Traffic Regulation Order prohibiting right-hand turns in Abridge Road would be needed if the Golf Course development was completed. This recognises that Abridge Road with its 60mph speed limit is potentially very hazardous. Despite the views expressed in the Robert West Report the Society believes a fully developed car park with 179 places accessed from Abridge Road at 'rush hour time' would be a far greater danger than a Golf Course with less traffic. 85% of this commuter traffic is predicted during one hour only in the morning making 7.00 – 8.00am a particularly hazardous time, the very time period when many children are going to school. The Robert West report fails to fully recognise the full adverse impact on nearby rural roads other than the Abridge Road. Coopersale Lane, a protected lane near to the proposed site, is almost certain to be used as a 'rat run' by cars seeking to avoid Epping and Abridge at rush hour times. This road is very narrow in places and unsuitable for carrying increased volumes of traffic. The narrow bridge at Abridge is already a problem with traffic queuing back both ways at busy times. Again the problems would be exacerbated by the introduction of a car park at Theydon Bois.

Some Directors of Parkeng Limited are also, or have been, directors of Blunts Farm Estates Limited, a company that has a poor history of complying with the provisions of planning applications and is at present the subject of two Enforcement Notices. The present occupant of the proposed site (ex. Forrester's Club land), which he has illegally littered with unsightly portacabins, a caravan and other structures is also the subject of a recent Enforcement Notice and currently legal proceedings. The actual ownership of the land is probably still with Blunts Farm Estates, who are ultimately responsible. Officers will also remember the problems in 2008 over the construction of a Motto Cross Track on the adjacent Blunts Farm site. There have more recently been 'Land Banking' schemes on the Blunts Farm where plots of land are being sold as future housing development plots. These sales on Green Belt land have been warned against by Trading Standards and it is inconceivable that the directors of Blunts Farm Estates and Parkeng Ltd. are not aware of these sales. It is quite appropriate for an LPA to take into account the prior history of any applicant when deciding on the merits of an application. We would suggest that the past evidence here speaks for itself.

This application is totally without merit, would be harmful to the Green Belt and would set a harmful precedent possibly to be used as 'leverage' for further undesirable applications. It would increase environmental pollution and light pollution. It would not have any economic advantages for Theydon Bois. Eric Pickles, the Secretary of State for Communities and Local Government has already indicated the

importance of 'Localism' to LPAs when deciding on planning applications. The Society has over 1,700 members in Theydon Bois and following the publication we have been contacted by many people concerned about this application, but none speaking in its favour. We would suggest that the "selected" press notices supporting commuter parking accompanying the application are of little merit and the views of Theydon Bois villagers, who would have to live with the deleterious effects of the proposed car park if approved, are of much greater import.

We very strongly urge you to refuse this application.

Mr J F Watts, *for the Society.*

C.c. Eleanor Laing MP,
Parish Cllr Peter Gooch,
District Cllr. Sue Jones,
District Cllr. John Phillip
Theydon Bois Parish Clerk, Parish Office.