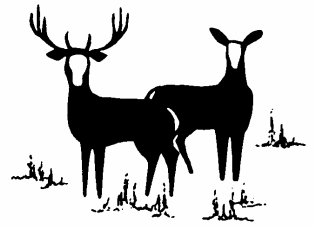


Theydon Bois and District
Rural Preservation Society
Affiliated to the Campaign to Protect Rural England

Registered Charity No. 286364
Established 1943



Theydon Bois, Epping
Essex CM16 7JU

The Planning Inspectorate
Room 3/16
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6PN

7th August 2011

Dear Sir/Madam,

Appeal Ref: APP/J1535/A/11/2155393/NWF
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.

I write in connection with the above planning appeal, as the Society was one of the original objectors. We understand you have been forwarded and will take into account our original objections to this planning application. We would wish to add these further comments in the light of the appeal process.

We fully support our LPA's view that this application will harm the objectives of the Metropolitan Green Belt and that there are no special circumstances that justify the inappropriate development of a commuter car park built on this Green Belt land.

In their 'Grounds for Appeal' (1) the Appellants offer **no new evidence** of 'very special circumstances' merely claiming that their planning application had been "properly researched and planned" and therefore there were 'special circumstances' not contrary to PPG2 and Local Plan Policies CP3 (iii) and GB2A. In our original letter of objection sent to our LPA, EFDC on 21st October 2010 we gave reasons why this research, in particular the Robert West Report, did not properly identify a need for a Car Park at Theydon Bois nor consider its appropriateness in this Green Belt location. This was the same view taken by EFDC officers in their reasons for refusing the application.

In their 'Grounds for Appeal' (2) the Appellants claim their "proposal has been rigorously researched and planned and would not lead to congestion on the local road network or rail system and therefore does not amount to unsustainable development contrary to PPG13". Clearly they have failed to fully take onboard the intention of this document that states:

"Planning Policy Guidance 13's objectives are to integrate planning and transport at the national, regional, strategic and local level and to promote more sustainable transport choices both for carrying people and for moving freight".

The provision and promotion of a large car park in this location would actively 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. Unfortunately because of the lack of a properly integrated fare structure (for instance Harlow is closer to London than Ware but travel from Ware is £61.40 a month less expensive) with only a small amount of promotion people are easily encouraged to travel further by car to access the cheaper Transport for London Underground services to central London. **(See Appendix 1)**. The fact that the white paper *A New Deal for Transport: Better for Everyone* (July 1998) has not been fully implemented with regard to the above fare integration should not allow the wider aims of PPG13 in preventing “*the way we travel and the continued growth in road traffic from damaging our towns, harming our countryside and contributing to global warming*” to be ignored. The construction of a large Car Park at Theydon Bois would do nothing to fulfil policy objective **4.3** to “*reduce the need to travel, especially by car*”. There is no need for further parking provision in Theydon Bois for its residents and spaces for any growth by commuters who have a genuine need to access the Central Line can be met by the spaces available in Debden (see below). It is only by the active promotion of the TFL fare savings, the encouragement of unsustainable travel and the introduction of further parking restrictions in Theydon Bois that this car park has any chance maintaining a high level of occupancy.

We believe many of the commuters seeking the reduced travel costs by driving to Theydon Bois station are also aiming to maximize their savings by parking for free and will only pay as a last resort. Since the parking restrictions to discourage commuter parking on residential roads in Theydon Bois were introduced, there are now approximately 50 places for parking on non restricted roads within easy reach of the station; 40 of these are in Station Hill (close to the station) and 10 in Chapel Road. All these spaces fill very early and generally much before the Station Car Park. Approximately a further 20 commuters are prepared to park as far away as Hornbeam Road to avoid paying.

That there is no need for further commuter parking as the majority of commuters still coming to Theydon Bois are seeking to park for free, can be seen from an examination of Car Parking in Debden **(see Appendix 3, 4 & 5)**. Debden is one stop closer to London on the Central Line than Theydon Bois and the Car Parks in Debden are as easily accessed by road as the one in Theydon Bois, particularly for those traveling via Abridge. Debden Station Car Park has the same charges as Theydon Bois **(See Appendix 2)**, but a larger number of spaces (209). There are usually some spaces free in this car park (week day average 30). There are two further Car Parks close to Debden station, Burton Road (102 spaces, week day average free = 42) and Vere Road (69 spaces, week day average free = 32). The charge for Burton Road is only £2.80 a day **(see Appendix 2)**. The full day charge for Vere road is £9.00 to discourage commuter parking, but if Burton Road was more fully occupied by commuters the displaced short term parkers could still be accommodated in Vere Road where the short term rates are the same as Burton Road and there are available spaces. Even with car park spaces available and the lower rates for parking in Burton Road, Debden still have problems with commuters seeking to park for free on non restricted residential streets **(See Appendix 3 & 7)**. Torrington Drive, the NE end of the Broadway and part of Wllingale Road are all blighted by parking. The Council Car Parks were better utilized by commuters before the introduction of charges. This evidence would suggest that there is no overwhelming demand for more paid spaces locally, the approximately 70 commuters parking on Theydon’s residential roads could be accommodated without much difficulty in Debden’s car Parks if further parking restrictions were introduced or they were willing to pay. Our intention here is not to propose that the residents of Debden should have to tolerate damaging and unsustainable commuter road traffic, but to show that what is needed is government action in ensuring an equitable transport fare structure throughout the transport network to further discourage unsustainable travel by car.

The introduction of this car park would encourage more people to travel from greater distances trying to find free residential parking in our village and Debden who would intend paying only as a last resort. This would exacerbate congestion on local roads and increase passenger crowding on the Central Line. Transport for London has previously indicated that they do not wish to encourage increased use of the Central Line from

Epping and Theydon Bois and Debden. 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 during peak times. The Inspector may want to consider a visit to examine car parking in Debden as part of his site visit.

There is no proper business plan to support this application and it is quite likely that even with unsustainable travel and the ‘poaching’ of commuters from other areas already well served by public transport that it will be under utilized. Given the high infrastructure, maintenance and staffing costs suggested by the proposal it is ultimately likely to fail. The reluctance of many people to pay even £2.80 for one day of parking would suggest that even if the rate for the proposed car park were £3.50 day (same as present TFL) it would be difficult to achieve full occupancy especially without further parking restrictions in Theydon and Debden. There are many free spaces in both Theydon and Debden station car parks at weekends so income would be negligible at these times, but staffing and maintenance levels would still have to be maintained. It is only with the wider promotion of using cheaper TFL services and further local parking restrictions that full occupancy for 5 days a week is likely to be achieved. Even if this level of occupancy could be achieved it would seem unlikely that this is a viable business at a charging level acceptable to commuters.

In their ‘Grounds for Appeal’ (3) the Appellants claim that “the proposal would not prevent the land being brought back into use in the future”. At the same time they are seeking a change of use from “Agricultural/Horticulture/Glass” and propose 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 appellants are trying to “soften up” this Green Belt site, with a commercially unviable parking provision. We are of the opinion that the real future intention is the development of other more commercially viable activities on this site. Some Directors of Parkeng Limited are also, or have been, directors of Blunts Farm Estates Limited the owners of the site. This company has a poor history of complying with the provisions of planning applications and is at present the subject of Enforcement Notices on both the Ex. Forester Club site and the adjacent Blunts Farm site that have not been fully complied with. In both cases they have as yet failed to restore the land to a level acceptable to the local residents and the LPA.

PPG17.10 states *“Existing open space, sports and recreational buildings and land should not be built on unless an assessment has been undertaken, which has clearly shown the open space or the buildings and land to be surplus to requirements.”* The appellants state that “the site is not needed for community sports use and there is no need for increased playing pitch provision at present” yet they bring no proper assessment or evidence to support this assumption. The intentions of PPG17 with regard to Open Space Provision are in any case wider.

PPG17.2 *“As a minimum, assessments of need should cover the differing and distinctive needs of the population for open space and built sports and recreational facilities (as outlined in the annex). The needs of those working in and visiting areas”-* (the sports facility on this site was previously used by Queen Mary’s College, London) – *“as well as residents should also be included”* **PPG17.16** *“The recreational quality of open spaces can be eroded by insensitive development or incremental loss of the site. In considering planning applications - either within or adjoining open space - local authorities should weigh any benefits being offered to the community against the loss of open space that will occur.”* **PPG17.17** states: *“Local Authorities should:*
i. avoid any erosion of recreational function and maintain or enhance the character of open spaces;
ii. ensure that open spaces do not suffer from increased overlooking, traffic flows or other encroachment;
iii. protect and enhance those parts of the rights of way network that might benefit open space; and
iv. consider the impact of any development on biodiversity and nature conservation.”

We are strongly of the opinion that EFDC have therefore correctly interpreted PPG17 and Alterations policy RST14 and the appellants bring no evidence to suggest otherwise.

In their 'Grounds for Appeal' (4) the Appellants claim "The proposal would not appear conspicuous in this specific location within the Green Belt and would not detract from the character and visual amenities of the area including "Skyglow" or its openness". We believe we adequately covered "Skyglow" and our local 'Dark Skies Policy' in paragraph 9 of our original letter.

Public Footpaths 4 and 5 would be directly and adversely affected. We can confirm that these footpaths are regularly used by our members and other ramblers, even with the present access difficulties. Openness of Green Belt and the urban fringe is vitally important here. Parkeng say that the site lies in a hollow and is shielded. This is not the case. As well as from footpath 4 which traverses the site, it can easily be seen from a section of footpath 5 and it is also visible from Footpaths 14 and 10, on the high ground further towards the M25. This is readily apparent at the moment because of the unsightly portacabins on the site (see non compliance with Enforcement Notices above and Appendix 8). Parked cars with reflective surfaces would not be an improvement after the final removal of these 'eyesores'. The site is again clearly visible from the much used public open space on the hillside of Great Gregories, adjacent to Epping Forest buffer land which can be accessed from the end of Forest Drive. **(See Appendix 8)**

In their 'Grounds for Appeal' (5) the Appellants claim "The proposal would not materially affect the amenities of residents at Parsonage Farm through noise, light or vibration associated with traffic movement". It seems impossible to credit this claim given the proposed access arrangements for the Car Park as (if full occupancy is achieved) in excess of 350 extra traffic movements a day (in winter most in darkness, requiring lights) will be taking place. There will be a considerable affect not only on the residents of Parsonage Farm, but also of those in Forest Drive.

In conclusion we believe this proposal shows no special circumstances for a development in the Green Belt and therefore is contrary to PPG2 and Local Plan Policies CP3 (iii) and GB2A. It is contrary to PPG13 as it does not form part of a well researched or properly integrated and sustainable transport policy and will therefore cause further road congestion and environment pollution. There is no proper business plan to support the application and it is likely the venture will fail leaving the local community with the consequences. It is an insensitive development contrary to PPG17 that will cause an incremental loss to the site, its value to the community, biodiversity and nature conservation. It would have an excessive adverse impact upon the openness, rural character and visual amenities of Green Belt contrary to Local Plan Policy GB7A. There will be considerable disturbance, noise and visual impact to the residents of Parsonage Farm and Forest Drive contrary to Local Plan Policy DBE9. We believe that our LPA has made the correct decision in refusing this application and that the appellants have brought no new evidence in support of their appeal and the application is entirely without merit.. **We therefore strongly urge you to refuse this appeal.**

The Society would welcome a copy of your decision.

Mr J F Watts, *for the Society*.

C.c.

Cllr. Sue Jones

Cllr. John Philip

Parish Cllr. Peter Gooch

Theydon Bois Parish Clerk, Parish Office

Stephan Solon – EFDC

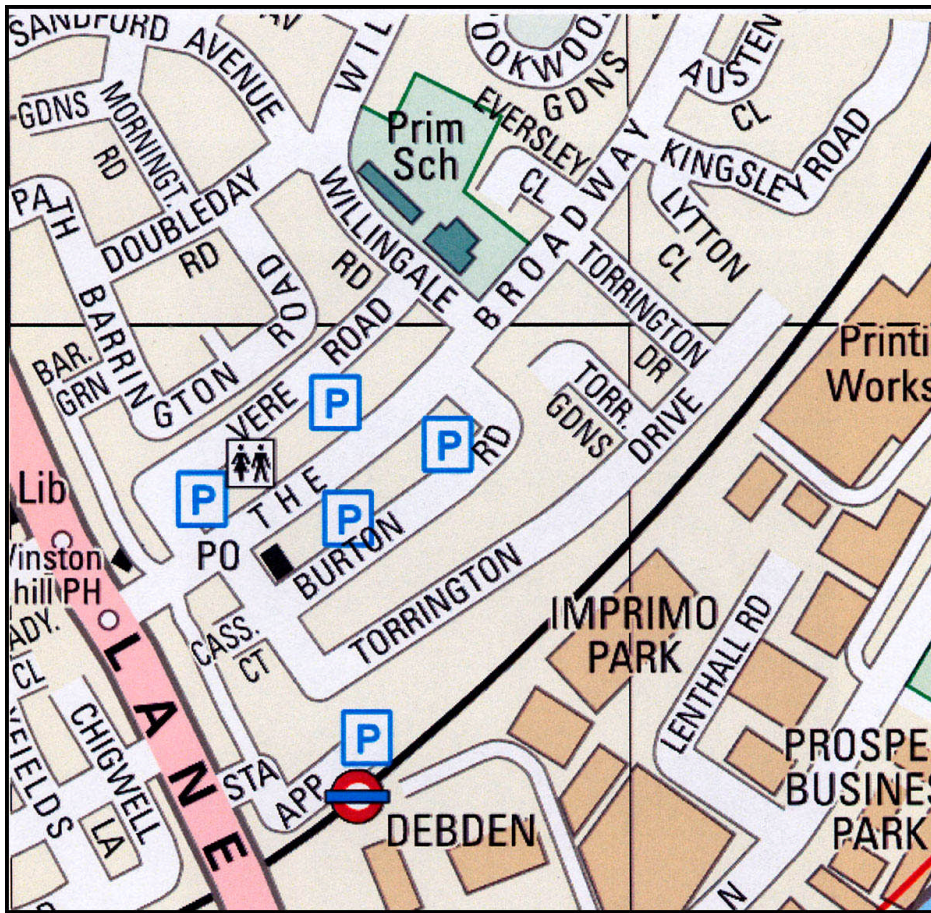
Appendix 1 Fares Comparison

<u>Station</u>	<u>Weekly Season</u>	<u>Monthly Season</u>	<u>Difference to TB (week)</u>	<u>Difference to TB (Month)</u>
Theydon Bois	£50.40	£193.60	-	-
Debden	£50.40	£193.60	-	-
Brentwood	£75.80	£282.30	+£25.40	+£88.70
Bishops Stortford	£103.50	£397.50	+£53.10	+£203.90
Chelmsford	£100.50	£386.00	+£50.10	+£192.40
Harlow	£91.50	£351.40	+£41.10	+£157.80
Hertford East	£84.00	£322.60	+£33.60	+£129.00
Stansted	£108.20	£412.80	+£57.80	+£219.20
Sawbridgeworth	£99.00	£380.20	+£48.60	+£186.60
Ware	£75.50	£290.00	+£25.10	+£96.40

Appendix 2 Car Park Charges

<u>Parking Time</u>	Theydon Bois Station	Debden Station	Burton Road	Vere Road
Week Days				
30 minutes			10p	10p
1 hour			65p	65p
2 hours			£1.40	£1.40
3 hours			£2.80	£9.00
All Day	£3.50	£3.50	£2.80	£9.00
Saturday	£1.50	£1.50	Free	Free
Sunday	£1.00	£1.00	Free	Free

Appendix 3 Debden Car Park Locations



Appendix 4 Debden Car Park Occupation

		Debden*** Station	Burton Road	Vere* Road (1)	Vere* Road (2)	Total Spaces
Total of available non Permit Holder Spaces		209	102	38	31	380
<u>Date</u>	<u>Time**</u>	Spaces Free	Spaces Free	Spaces Free	Spaces Free	<u>Total Free Spaces</u>
Wed 27 th July 2011	10.05am	22	38	18	13	91
Thurs. 28 th July	10.45am	8****	36	17	13	74
Fri. 29 th July	10.20am	55	41	17	11	124
Sat. 30th July	9.50am	191	67	20	10	288
Mon. 1 st Aug.	9.30am	38	55	17	19	129
Tues. 2 nd Aug.	9.29am	23	58	15	18	114
Wed. 3 rd Aug.	9.47am	35	58	20	19	132
Thurs. 4 th Aug.	10.21am	8****	38	20	18	84
Fri. 5 th Aug.	10.15am	53	51	17	12	133
Daily Average Free (Excluding Saturday).		30	42	17	15	110

*The Vere Road Car Park is in two sections. We have designated the farthest from the station as section 1 and the nearest as section 2. The farthest point of all the above Car Parks is less than 5 minutes walk to Debden Station entrance.

** Start times for the survey were to allow maximum commuter occupation of the Car Park. Time stated is start of survey. Burton Road was surveyed first, then Debden Station and then Vere Road 1 & 2. Time taken from start to finish for each survey of all Car Parks was approx 20mins.

*** TFL Website lists **188** Car Parking spaces for Debden Station, but our count suggests 209. Burton Road and Vere Road total spaces are our counts. Debden Station Car Park has 5 disability spaces. Burton Road has 4 disability spaces. On all our visits there was at least one disability space free in each car park. There are no disability spaces allocated in Vere Road.

**** Thursdays seem to show a greater rate of occupation of Debden Station Car Park than other days, but this could be due to heavy rain on 4th August and threatened rain on 28th July. There was also greater occupation on 2nd August when it rained.

Appendix 5 Photo Evidence of Car Park Spaces



Burton Road Car Park View to SW at 10.47am on 28/7/11



Vere Road Car Park View to SW at 11.30 on 28/7/11



Debden Station Car Part View to N at 10.36 on 29/7/11



Vere Road Car Park View to S at 10.46 on 29/7/11



Burton Road Car Park View to N at 10.51am on 29/7/11



Burton Road Car Park View to SW at 9.52am on 30/7/11



Debden Station Car Part View to NE at 10.13 on 30/7/11



Vere Road Car Park View to S at 10.24 on 30/7/11



Debden Station Car Part View to SE at 9.43 on 1/8/11



Burton Road Car Park View to N at 9.491am on 1/8/11



Vere Road Car Park View to SW at 9.54 on 1/8/11



Burton Road Car Park View to NE at 9.31am on 2/8/11



Debden Station Car Part View to NE at 9.36 on 2/8/11



Vere Road Car Park View to NE at 9.45 on 2/8/11



NB. (1) Files sizes have been limited to meet Planning Inspectorate Website attachment requirement. Photos print more sharply than they appear on screen. Date and time stamp are taken from camera EXIF data. Original higher resolution photos with full EXIF data can be made available.

NB. (2) Red Mini in Burton Road Car Park was parked in same position all week.

NB. (3) Our observations of traffic movements during the times of the survey and a comparison with Saturday figures leads us to the conclusion that the majority of occupancy of the Burton Road Car Park is short term and that only 20 – 30 commuters accessing Debden Station at present use this car park. Short term occupation of Burton Road Car Park by shoppers increases later in the day (see below). Many commuters park in non restricted spaces in Torrington Drive, The Broadway and parts of Willigale Road.

NB. (5) Although it could be claimed that the occupancy of these car parks is somewhat less than normal as August is a holiday period Appendix 6 below for Burton Road shows there are normally free spaces at other times even later in the day with more shoppers traffic. Compare 29th July 2011 in Appendix 6 with appendix 4.

Appendix 6 Burton Road Car Park Occupation (Earlier Dates/later times)

<u>Date</u>	<u>Time</u>	<u>Free Spaces</u>
Wed. 20 th Oct. 2010	11.47am	41
Thurs. 28 th Oct.	12.04pm	25
Wed. 3 rd Nov.	10.57am	56
Fri. 5 th Nov.	10.33am	52
Wed. 10 th Nov.	1.00pm	23
Mon. 24 th Jan. 2011	1.39pm	39
Tues. 14 th June 2011	11.56am	27
Tues. 5 th July 2011	10.44am	27
Friday 29 th July	1.26pm	26

Appendix 7 Residential Parking in Debden

14/6/11

guardian-series.co.uk

EO

'Ban commuters from our street'

By TOM PORTER

tporter@london.newsquest.co.uk

FAMILIES fed up with commuters parking outside their homes have demanded the spaces be made residents-only.

People in Torrington Drive, Loughton, have to leave their cars parked outside their homes until after the morning rush-hour, or risk losing them for the rest of the day.

It is only a short walk to Debden Station so it is popular with commuters who do not want to pay to park.

However, their presence makes it difficult for locals to get in and out of their properties and elderly residents are worried ambulances cannot park directly outside their homes.

Barry Johnstone, 63, has lived in the street for five years and has launched a petition demanding the district council put an end to the free-for-all.

He said: "What do we have to do? We have been told that there is not enough money to take any action now and it will have to wait until the parking

review next year.

"I am a former fireman and can see the difficulties emergency vehicles have accessing the area.

"If we have to go out shopping first thing we have no chance of getting back in and it has become dangerous. An ambulance had to park in the middle of the road, and carers

'I'm a former fireman and I can see the difficulties emergency vehicles have'

have nowhere to park and have to walk for ages to see people."

Seven years after the start of a district-wide parking review which has so far cost more than £900,000, planners have yet to implement any reforms in Loughton.

Neighbour Jenny Figgins, 62, said: "The grass verge opposite the block is often completely churned up by vehicles. It is just such a mess.

There are huge welts in the ground.

"It has to be commuters as all of the spaces on the verge are taken before 7am.

"There is a street on the other side of Debden that has the same problem and the council have put up a fence blocking off the grassy area. Why can't they do the same thing here?"

A spokesman for the district council said: "The council has carried out an informal consultation in the Torrington Drive area under the Loughton Broadway Parking Review. The responses will be used to prepare plans for parking restrictions and a formal consultation will be carried out in February 2012.

"Among the things that might help could be waiting restrictions or residential parking permits.

"The cost of these schemes is high and money is in short supply. We will never be able to solve the problem of too many cars for too few spaces, but hopefully the parking review will go some way to making the situation better."



Residents of Torrington Drive

(EL25082)

Hurt or
Injured?
Let us help



Road Accidents

Your views

I HAVE every sympathy with the commuter parking problems experienced by residents living around The Broadway area of Loughton (Guardian, October 14). They are probably suffering from long-distance economic migrant commuters, who drive from places that already have their own railway stations into London, to access cheaper travel on the Central line.

Commuter parking problem down to simple economics

money driving from Harlow, Bishop's Stortford, Broxbourne, Ingatestone, Brentwood, Chelmsford etc, they are not prepared to pay more money to park. The council car park behind Loughton Broadway costs only £2.80

per day and is within three minutes' walk of Debdon Station, but there are always vacant spaces there. Yet commuters will still park for free whenever they can find a space in a nearby street, such as Colson Road.

The introduction of yellow bands in Theydon Bois has largely dealt with the problem. However, plans have recently been registered, in a second attempt, to develop Green Belt land in Theydon Bois as a commuter car park.

The charges would be in line with other nearby Tube stations. However, the recent increase in charges for Tube station parking has resulted in a public outcry, with Epping charging £5.50 per day. From the outset, the proposed car park in Theydon Bois would be financially unsustainable.

Dr John Warren, Woodland Way, Theydon Bois.

Call to re-point CCTV cameras to end fly-tipping



Jo Knight at Barnados in Loughton wants council help to end fly-tipping (EL23109-4)

A CHARITY shop boss is pleading with the council to turn its CCTV cameras in her direction to catch the fly-tippers that are plaguing her store.

Joan Knight, 58, who runs Barnardo's in Debdon Broadway, has to spend the charity's money hiring extra bins to cope with the broken furniture, toys and sacks of clothes dumped at the back of her shop out of hours, and she believes CCTV is her only hope of solving the problem.

"As it's getting nearer to Christmas, it's going to get worse," she said. "There are CCTV cameras, but they're on the car park."

Mrs Knight said the car park behind the shop had not been well-used since the council started charging people to use it, so there was less of a need for security cameras there.

"If they were pointed in this direction, at least it would stop all the dumping," she added.

She said that the shop could not accept donations unless they were left between its 9am to 5pm opening hours, as anything left outside gets wet and dirty, especially with snow falling on top of it overnight.

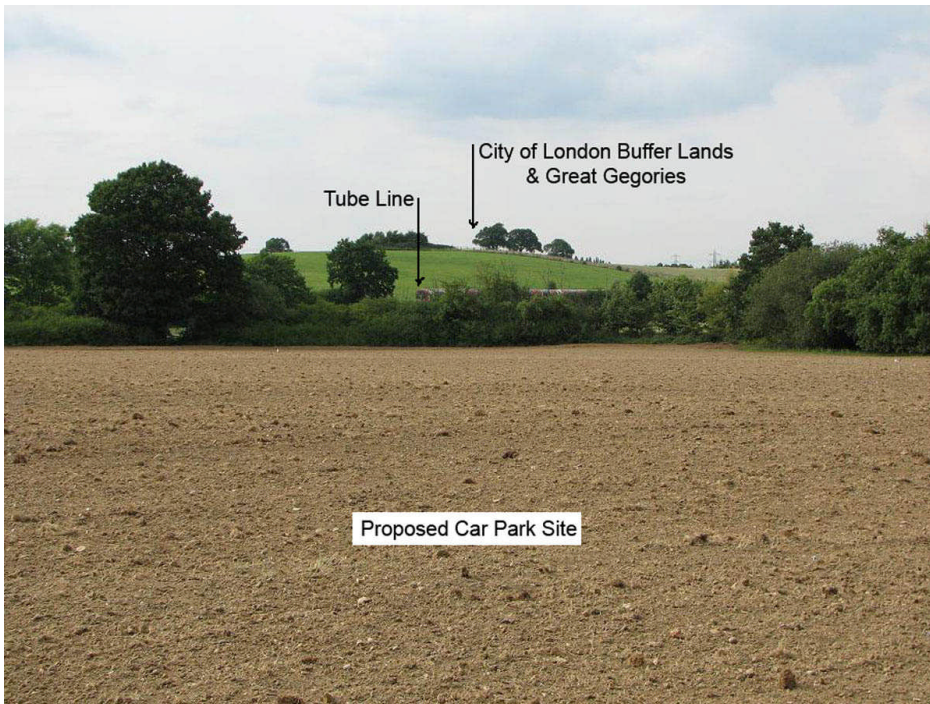
A spokeswoman for the district council said it had no formal record of a discussion with Mrs Knight, but added: "We are happy to work with Barnados to try and prevent any further inappropriate donations, including the possibility of re-directing the council's CCTV for a short period, or the use of other temporary cameras."

"However, any permanent deterrents will have to be installed by the private landowner to protect their land."

Appendix 8 Photos of Sight Lines to Proposed Car Park.



View over Proposed Site to North from footpath 4.



View over Proposed site looking North West to City of London Buffer Lands and Great Gregories.



View West to Proposed Site from Footpath 14 (Zoomed in) showing present portacabins and vehicles.

NB. Again picture will be sharper when printed and originals can be made available.