

## Epping Forest District Council Representations to the Draft Local Plan Consultation 2016 (Regulation 18)

Stakeholder ID 2867 Name GWENDOLYN DELLAR

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Method Survey

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Date

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### Survey Response:

1. Do you agree with the overall vision that the Draft Plan sets out for Epping Forest District?

Agree

Please explain your choice in Question 1:

Thus is a laudable vision, as far as it goes, although it does not mention needs such as mental well-being and avoiding childhood obesity through exercise . HOWEVER, the plan would not, in my opinion, lead to this vision being implemented in Debden/Loughton. By proposing to build on the remaining green spaces (in particular Jessel and Rochford Greenes and Luctons field), it cannot achieve the stated aim of protecting the environment. The intensification of this settlement will lead to more traffic congestion, air pollution and possible flooding from run-off water.

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2. Do you agree with the overall vision that the Draft Plan sets out for Epping Forest District?

Strongly disagree

Please explain your choice in Question 2:

The existing settlement of Loughton/Debden is already pretty much saturated. Infrastructure is already coping poorly and EFDC cannot guarantee that it will be improved to cope with the expansion, since it is not the decision-maker for TfL, school building and other infrastructure requirements.

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3. Do you agree with the proposals for development around Harlow?

No opinion

Please explain your choice in Question 3:

I am not from Harlow and have not read the relevant chapter of the plan

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4. Do you agree with the proposed shopping area in...

Epping?

**No opinion**

Buckhurst Hill?

**No opinion**

Loughton Broadway?

Yes

Chipping Ongar?

**No opinion**

Loughton High Road?

Yes

Waltham Abbey?

**No opinion**

Please explain your choice in Question 4:

I disagree with the Langston Road retail park. It is unnecessary, since Westfield, Lakeside, Blue Water and Harlow are close enough and widely used. It will obviously have a negative impact on the Broadway, in particular if no safe, attractive, user friendly links for walking between the two areas are not provided.

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5. Do you agree with the proposals for new employment development?

Agree

Please explain your choice in Question 5:

Langston Road is already an "employment hub", so it should be extended as such, not as a retail park.

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6. Do you agree with the proposed sites in your area?

Epping (Draft Policy P 1):

**No opinion**

Please provide reasons for your view on Epping:

Loughton (Draft Policy P 2)

**No**

Please provide reasons for your view on Loughton:

As already stated, the sites on Debden Estate are green spaces and are vital for physical and mental well-being. Luctons field at the very least should serve its covenanted purpose of educational and recreational

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uses. This area is saturated and virtually all infill sites have been used, except for green spaces, which are essential for residents' health and well-being and to help tackle childhood obesity, one of the NHS priorities, through outdoor exercise. The local road and underground infrastructure cannot always cope with the present occupation levels. The more than 3% increase will lead to difficulties for the underground. There will be a shortage of school places. If the Luctons field is built on, where could additional school accommodation be built? There is no guarantee that the necessary infrastructure will in fact be provided. If it is not, EFDC will

then be obliged to refuse planning permission to build homes, due to insufficient provision of infrastructure. So the draft plan would then in any case be inapplicable and another solution would have to be sought.

Waltham Abbey (Draft Policy P 3)

**No opinion**

Please provide reasons for your view on Waltham Abbey:

Chipping Ongar (Draft Policy P 4)

**No opinion**

Please provide reasons for your view on Chipping Ongar:

Buckhurst Hill (Draft Policy P 5)

**No opinion**

Please provide reasons for your view on Buckhurst Hill:

North Weald Bassett (Draft Policy P 6)

**No opinion**

Please provide reasons for your view on North Weald Bassett:

Chigwell (Draft Policy P 7)

**No opinion**

Please provide reasons for your view on North Weald Bassett:

Theydon Bois (Draft Policy P 8)

**No opinion**

Please provide reasons for your view on Theydon Bois:

Roydon (Draft Policy P 9)

**No opinion**

Please provide reasons for your view on Roydon:

Nazeing (Draft Policy P 10)

**No opinion**

Please provide reasons for your view on Nazeing:

Thornwood (Draft Policy P 11)

**No opinion**

Please provide reasons for your view on Thornwood:

Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sewardstonbury, Sheering, Stapleford Abbots (Draft Policy P 12)

**No opinion**

Please provide reasons for your view on Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sewardstonbury, Sheering, Stapleford Abbots:

7. Do you agree with the approach to infrastructure provision being proposed in the plan?

Strongly disagree

Please explain your choice in Question 7:

Contrary to what is stated, the policies are not detailed. Nor is there any guarantee that policies adopted by EFDC will be executed by the bodies responsible for doing so. The DIDP actually cites Loughton/Debden as an area where there would be an increase of greater than 3% in eastbound or westbound peak hour travel, thus having "a material impact on the expected peak use of the Central Line". The DIDP also states: "Growth located in Epping, Loughton, Chigwell, Chipping Ongar and Waltham Abbey is likely to be accommodated through improving links to public transport services, including extensions and improvements to the existing bus services and improved walking and cycling." However, bus services to Debden are at present set to be cut and there is no detail on how "walking and cycling" will be improved.

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8. An Interim Sustainability Appraisal has been commissioned to support the Draft Local Plan. We would welcome any comments you may have on this.

The Community and wellbeing section states: "A concern relates to the loss of some open space within Loughton and Chigwell, but it is not clear that the local community will be significantly disadvantaged as there is good provision within the settlements, and access to the wider green infrastructure network. It is assumed that housing growth will be supported by upgrades to community infrastructure capacity, to the benefit of new and existing residents; however, there is considerable uncertainty at this stage - i.e. it is the case that there is more work necessary to refine the Infrastructure Delivery Plan. On balance, it is appropriate to conclude neutral effects at this stage, i.e. it is not possible to conclude positive or negative effects on the baseline." There would be good provision of open space, although it does not make any specific reference to how this might come about within Debden Estate. The access to the wider green infrastructure network it refers to does not give the opportunities to step out to play for 5 minutes or quickly walk the dog without having to use a car. These opportunities exist with the existing green spaces that it is proposed to build on in Debden estate. Nowhere are we told what "upgrades to community infrastructure capacity" might consist of. The document itself says that "there is considerable uncertainty at this stage - i.e. it is the case that there is more work necessary to refine the Infrastructure Delivery Plan." Given this situation, little confidence can be placed in this section of the Interim Sustainability Appraisal. The Transport section refers mainly to roads around Harlow. The crucial question of Central line capacity for the Loughton/Debden area is somewhat evaded: "The Council's own analysis for the Draft IDP and advice from Transport for London (TfL) suggest that there is sufficient capacity on the Central Line within the District. Epping Forest District Council are working with TfL as well as Redbridge Borough and Waltham Forest Borough Councils to consider and understand the effects of growth further down the Central Line." If there is that much uncertainty, it is unwise to envisage building even more homes in Debden/Loughton which would entail greater use of the Central line.

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9. Do you wish to comment on any other policies in the Draft Local Plan?

SP5 Green belt and district open land/ 3.96;3.97

" The NPPF (paragraph 77) requires the following tests are met in order to designate Local Green Space: • where the green space is in reasonably close proximity to the community it serves; • where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and • where the green space concerned is local in character and is not an extensive tract of

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land." In the light of the above quotation, I think that Jessel Green in particular fits the criterion for protection.

Draft Policy SP 6 The Natural Environment, Landscape Character and Green Infrastructure / C i) and ii)

C. "Towns and smaller settlements: i) the Council will protect the green infrastructure assets of the towns and smaller settlements and improve the quality of existing green space in towns and smaller settlements. ii) the Council will ensure that new development is designed to protect existing green infrastructure, ..." It does not seem that EFDC is taking account of this policy for Debden estate.

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