

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

Stakeholder ID	3777	Name	Karen O'Donoghue
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Method	Letter
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Date	6/12/2016
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### Letter or Email Response:

Dear EFDC I am writing to provide my feedback on the Draft Local Plan. While I welcome EFDC's efforts to plan for the areas future, I have deep reservations about the scale of the proposed development. I am also truly horrified by the proposal to build on Loughton's green spaces - Jessel Green, Rochford Green and Lucton's Field. As a resident on Chester Road, I regularly take my two year daughter to the playground on Jessel Green. My 12 year old stepson regularly plays there with his friends - it is an ideal location for an informal kick about. As he was a previous pupil at Thomas Willingale, I am also very much aware of how much Rochford Green is used by the local children after school. Our dog died of old age a couple of years ago -taking him for walks on our green spaces was a daily pleasure. Jessel Green also provides other unique opportunities for the community throughout the seasons. The sheer enjoyment for the children when it snows, sledging down "Teletubbie Hill" is not something I would want robbed from future generations. It also provides the ideal location for the annual summer fair - a wonderful community experience for the whole family. My personal feelings and love for our green spaces aside, I have read the Draft Infrastructure Delivery Plan and have a number of concerns about the feasibility, viability and sustainability about the scale of the proposed developments:

1. Flood risk The EFDC Draft Infrastructure Delivery Plan (Sept 2016) acknowledges that flood defence is a statutory obligation and that "the Roding catchment has a rapid response to rainfall and is vulnerable to flooding". The Loughton, Buckhurst Hill and Theydon Bois Surface Water and Management Plan (2016) identifies 5 Critical Drainage Areas in Loughton. Loughton as an area is particularly vulnerable to surface water flooding with around 1,000 properties at risk from flooding. The EFDC Draft Infrastructure Delivery Plan states that all proposed "sites are considered suitable for development from a flooding perspective, subject to mitigation measures as appropriate", however it does not provide any detail with respect to these measures nor provide assurance that any developments will not have a detrimental impact on increasing the flood risk elsewhere in the local area. The base of Jessel Green is sodden during the winter months. How can building on the remaining green spaces (Jessel Green, Rochford Green and Lucton's Field - nature's natural flood defences) fail but to increase the risk of flooding in Debden/ Loughton, particularly in areas that are already classified as Zone 2 I 3 by the Environment Agency? The recent House of Commons Future Flood Prevention Report (Nov 2016) states that "home buyers and the wider community must be assured that new development does not increase flood risk either at the development site or further afield." It also recommends that "the Government's commitment to build more affordable homes should not be achieved at the expense of flood resilience". Can the EFDC provide assurance that it will follow this best practice? Can EFDC provide a guarantee that a site by site flood risk assessment will be conducted for each of the proposed developments and that this will include assessing the impact on the potential increased flood risk on the rest of the Debden I Loughton area? And that where it is found to have an adverse impact that the proposed development will be abandoned?
2. Transport Road The EFDC

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Draft Infrastructure Delivery Plan (Sept 2016) identifies that current capacity constraints on the road network "present a range of challenges in supporting the proposed levels of growth for the area" and modelling has shown that by 2036, "the majority of junctions across the District had at least one arm operating above capacity" and that development against this background "is likely to result in an increasingly congested and unreliable road network". A shift "towards public transport will be required to support growth in a sustainable way". Growth in Loughton 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". While the shift to more sustainable modes of transport may be favourable, in practice is this realistic? Some of the topography in Loughton (e.g. Traps Hill) does not exactly lend itself to cycling. Equally "improving public transport links" does not ring true with the recent proposal to stop the 167 bus service between Debden and Loughton. The EFDC Draft Infrastructure Delivery Plan (Sept 2016) also states that there is limited funding and additional growth "will be largely accommodated by making better use of existing transport networks". Can EFDC confirm that if the detailed modelling, due to be commissioned shortly, indicates that the proposed developments (particularly building on Loughton's green spaces) will lead to further gridlock on our roads, the proposed developments will not proceed? Central line The EFDC Draft Infrastructure Delivery Plan (Sept 2016) states that "there are capacity issues further down the line during peak times and discussions about the implications of growth in EF District are ongoing with TfL". An assessment has already shown that the Loughton I Debden proposed allocations would lead to 3% increase in peak hour travel which is "considered to have a material impact on the expected peak use of the Central Line". However other than further consultations with TfL, the developments for Loughton I Debden are still being proposed without any mitigation strategy for this increased overcrowding on the Central Line. Using the Central Line currently during peak times is a thoroughly unpleasant experience and at times the overcrowding on both the trains and platforms feels downright unsafe. Can EFDC confirm that further modelling will be performed with TfL and that if this indicates that the proposed developments (particularly building on Loughton's green spaces) will lead to further overcrowding on the Central Line, that the proposed developments will not proceed?

3. Air Quality The transport section of the EFDC Draft Infrastructure Delivery Plan (Sept 2016) raises some serious concerns about the increased traffic congestion that could result from the proposed developments and also the limited funding I possibility to address it. The 2014 Air Quality Progress Report for EFDC, states that the main air pollution issues in the district are due to road traffic congestion. Bell Vue, Bell Common is already in breach of regulations with an annual mean concentration of NO<sub>i</sub> of 65 µg/m<sup>3</sup>. Residents in this area are already at increased risk of developing respiratory conditions. The 40 µg/m<sup>3</sup> annual mean NO<sub>2</sub> objective was also reached on the High Road Loughton and almost reached in 3 other locations in Loughton. Surprisingly there has not been any air quality monitoring at Chigwell Lane I Langston Road junction where traffic congestion is always heavy during rush hour. Those residents I employees currently have no information about the air quality in this area, never mind the impact of the new retail park or the proposed development of the green spaces. A recent DEFRA report on air quality (Dec 2015) proposes that the planning process should be used to improve air quality and includes a policy recommendation to make new planning proposals "air quality neutral" as a minimum. Can the EFDC provide assurance that it will follow this best practice? Can EFDC confirm that additional quality monitoring will be performed at Chigwell Lane I Langston Road junction? Can EFDC confirm that further modelling will be performed and if this indicates that the proposed developments (particularly building on Loughton's green spaces) lead to a detrimental effect on the air quality in the Debden I Loughton / Epping area, that the proposed developments will not proceed?

4. Epping Forest Epping Forest is designated as a Special Area of Conservation. The forest is internationally renowned for its ancient trees which are many hundreds of years old and in turn support many other rare and vulnerable species. Studies have shown that some of these species are already in decline due the current levels of air pollution. Can EFDC confirm that further modelling will be performed and if this indicates that the proposed developments (particularly building on Loughton's green spaces) lead to an adverse effect on air pollution, that the proposed developments will be abandoned in order to protect Epping Forest?

5. Obesity Children The recent Government report (Aug 2016) on Childhood Obesity states that we spend more each year on treatment of obesity and diabetes than we do on the police, fire service and judicial system combined. Currently a third of children aged 2 - 15 are overweight or obese and the Government aims to significantly reduce England's rate of childhood obesity in the next 10 years. While obesity is a complex problem, its root cause is an energy imbalance - taking in too much energy in food than we use for activity. Physical activity is associated with numerous health benefits in children and is also linked to improved academic performance. The UK Chief Medical Officers recommend that all children should engage in physical activity for least 60 minutes every day - 30 minutes at school and 30 minutes physical activity supported by parents I carers. The EFDC Draft Infrastructure Delivery Plan (Sept 2016) has found that

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with respect to children's playgrounds the current level of provision "is low compared to comparable benchmark authorities" and for Loughton / Debden further work is required to understand how "the loss of managed open space can be mitigated through new provision or improvements to quality and accessibility of existing spaces". Can EFDC provide a guarantee that sufficient green space and playgrounds will be maintained in order that the 30 minutes physical activity for children can be achieved by parents (factoring in the expected increase in population)? And give a commitment that this will be located within the recommended 5-10 minute walk for residents? Can EFDC also provide a guarantee that where development is proposed on Jessel Green, Rochford Green and Lucton's Field or other green spaces, that sufficient assessment/modelling is performed to ensure that the remaining green space can cope with competing demand ie very young children playing, dog walkers, informal kick about by older children " while not causing a nuisance to residents? The EFDC Draft Infrastructure Delivery Plan (Sept 2016) also states that "75% of adults in Essex are not meeting the recommended levels of exercise" and also that there is an existing "deficit of sports hall provision in Loughton and Debden". How does building on the remaining green spaces (Jessel Green, Rochford Green and Lucton's Reid) not further exacerbate this situation by reducing the local options for informal outdoor physical activity? The Plan is also contradictory: promoting the benefits of green spaces and use of parks for physical activity while simultaneously proposing to build on them, all the while stating there is basically no funding to improve other sport Infrastructure. Can EFDC provide a guarantee that contradictory nature of these proposals will be thoroughly resolved before proceeding with any development particularly on the green spaces Jessel Green, Rochford Green and Lucton's Field? 6. Education The EFDC Draft Infrastructure Delivery Plan (Sept 2016) identifies that Early Years provision is already under significant pressure. Having struggled to find a nursery place for my daughter, I am only too aware of this. I am also troubled by the fact that no approach has been outlined to address this or the additional increased pressure from the proposed developments. For primary schools, the "current infrastructure will be under significant pressure to accommodate the growing pupil population". For secondary schools in Loughton "forecasts demonstrate significant capacity deficits". The EFDC Draft Infrastructure Delivery Plan (Sept 2016) states that "the preferred approach to the expansion of existing schools / provision of new schools" will need to be developed in more detail with ECC. Can EFDC provide a guarantee that the provision of schools places will be thoroughly assessed and resolved before proceeding with any development particularly on the remaining green spaces Jessel Green, Rochford Green and Lucton's Field? Will EFDC give a commitment not to build on the Green Belt to achieve this expansion of schools? 7. Other Infrastructure The EFDC Draft Infrastructure Delivery Plan (Sept 2016) also identifies:

- GP surgeries: the key challenge is "providing high quality services for more people with less financial resources available" - further consultation required
- Dentists - no coherent approach to provision of dental services outlined
- Princess Alexandra Hospital "has seen a 50% increase in emergency admissions since 2010/11, making it one of the busiest departments in England" and has "significant capacity issues" -further assessment required on how to address hospital provision
- Adult social care for the elderly - further assessment required
- Ambulances: "experienced increasing pressure on services, particularly in the context of meeting response time target".
- Police and Fire Services are being rationalised, "trend will be towards a reduction in facilities to create a more efficient service and respond to financial pressures".
- Potential water deficit - further assessment required
- Gas & Electricity: new infrastructure needed - further consultation required

In summary, I found the Draft Infrastructure Delivery Plan raised more issues than it addressed and I am gravely concerned about the scale of the development proposed in particular on Loughton's green spaces. To me it suggests a more coherent national approach to delivering the country's housing and employment needs is required rather than trying to further over develop the south east of England. I look forward to any future response and will be monitoring forthcoming progress of the plan carefully. Yours faithfully Karen O'Donoghue

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