



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

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## Letter or Email Response:

Dear Sirs In my opinion, the current proposed EFDC plan for the Loughton/Debden area is not appropriate due to the following considerations: 1)Open space provision: This point refers especially to Jessel Green, Rochford Green and Luctons field. Destroying open spaces will have an adverse effect on children's obesity rates and related diseases. It would not be easy for children just to pop out to Epping Forest or the Roding nature reserve to play for 10 minutes after school. This could lead to greater use of cars to get to suitable areas (or to children just staying indoors on their computers). As regards dog walking, according to the Kennel Club, dog owners "will on average walk no further than 400-500 metres to get to greenspace that is in all other ways suitable for exercising their pets. Thus greenspace needs to be within this distance to dissuade dog owners from driving to what they perceive as more suitable areas for the daily dog walk." (Planning for dog ownership in new developments: reducing conflict - adding value access and greenspace design guidance for planners and developers March 2013 page 8) This could be the case if Jessel Green, Rochford Green and Luctons field are built on and become unsuitable for dog walking. The mental and physical wellbeing of the public in general could be affected. Jessel Green is used for many village green activities and dog walking. Luctons field is widely used by dog walkers and was used for sporting activities in the past before the field ceased to be cut and became unusable for such activities. Applications were made for village green status for Jessel Green and Luctons field. I believe that no decision has been made on the status of these applications, despite the considerable time that has elapsed since they were made. Debden estate was designed as a garden city. The green spaces which it is proposed to eliminate or reduce are the equivalent of London's parks. The following figures from the Draft Infrastructure Delivery Plan (DIDP) (DIDP Final 30 September 2016 page127) forecast the following additional demand for space, so it would seem illogical to reduce existing green spaces. Figure 83: Open space additional demand (newly arising only) - by settlement groups Settlement group Managed open space (ha) Informal recreation grounds (ha) Buckhurst Hill, Loughton/Debden, Theydon Bois and Rural Apportionment 2.54 1.98 Figure 84: Children's play demand (newly arising only) - by settlement Settlement Children's play space (m<sup>2</sup>) Loughton / Debden 1078 2)Infrastructure considerations: In my opinion, the current transport infrastructure is insufficient to cope with more homes and it is not clear that this infrastructure could actually be improved to cope with the new homes proposed. a) Roads The roads are already congested, as mentioned in the Draft Infrastructure Delivery Plan (DIDP): "Routes through Loughton are congested. Congestion around Loughton is exacerbated by the fact that Junction 5 of the M11 has no northbound slip road, which subsequently draws traffic into the surrounding areas to access the motorway. 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." (Draft Infrastructure Delivery Plan (DIDP) Final 30 September 2016 pages 20 and 21). At present, bus routes

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to and from Debden are set to be cut. Plans for "improved walking and cycling" do not seem to be very far advanced. There is at present no cycle lane to Debden station, for example. At present, during rainy weather, some drains cannot cope and pedestrians are likely to be liberally sprayed by passing cars (for example, along Rectory Lane on the pavement below the play park area and at the corner of Langston Road by the BMW premises). Photos of this can be provided. We have no concrete assurances that the situation is likely to improve, so we cannot be sure that people will actually want to walk more than they do at present. b) The Central line. The DIDP includes the following figures on the underground: Train loading in Epping Forest district Station AM Peak Hour (0800-0900) PM Peak Hour (1700-1800) Eastbound Westbound Eastbound Westbound Loughton6% 37% 10% 9% (DIDP Final 30 September 2016 page 23) This shows capacity at Loughton station and other stations. However, the table ignores the train loading between Woodford and Stratford and beyond and the considerable discomfort currently suffered by all commuters between those stations at peak times, even before any additional passengers are added at the Epping-Loughton end of the line. The following statement in the DIDP highlights this problem: "In the assessment, growth in any settlement which would result in an increase in eastbound or westbound peak hour travel of over 3% was considered to have a material impact on the expected peak use of the Central Line, and growth in any settlement which would result in an increase of over 10% was considered to have an impact on the capacity of the stations to accommodate this growth in demand. No settlements were found to have an increase of more than 10%, and only two (Epping and Loughton-Debden) were found to have an increase of over 3%." (my italics) (DIDP Final 30 September 2016 page 24). Even if Central line capacity between Epping and Leyton could be extended, it is not clear how capacity between Leyton and Stratford could be extended to cope with this expected increase. Moreover, it is not EFDC that takes the decisions on building new infrastructure. As stated in the DIDP "Upgrades to the Central Line would be the responsibility of TfL," (DIDP Final 30 September 2016 page 25). c) School capacity needs The DIDP gives the following figures for school capacity needs (pages 55 and 58) Figure 28: Primary schools additional demand (newly arising and existing capacity/shortfall) - by Forecast Planning Group (FPG) Forecast Planning Group Settlements Total demand at end of Plan period (FE) Newly arising demand over Plan period (Pupils) Loughton (Group 06) Loughton/Debden; Theydon Bois 1.65 346 Figure 38: Secondary schools additional demand (newly arising and existing capacity/shortfall) - by Forecast Planning Group (FPG) Forecast Planning Group Settlements Total demand at end of Plan period FE Newly arising demand over Plan period (Pupils) Loughton (Group 01) Buckhurst Hill; Chigwell 3.08 647.44 Buckhurst Hill; ChigwellEpping/Waltham Abbey (Group 02) Chipping Ongar; Epping; Loughton/Debden; Waltham Abbey; NorthWeald Bassett; Theydon Bois; Thornwood 5.13 1077.63 For secondary groups 01 and 02, forecasts demonstrate significant capacity deficits for the academic year 2019/20. "The delivery of schools is likely to be a combination of new schools sites and expanding existing infrastructure. ..... With regard to the strategic sites, a combined delivery approach should be taken, to ensure that increased demand is accommodated within close proximity to growth locations. Further consideration will be given to the need to review Green Belt boundaries where appropriate to allow the expansion of schools." (DIDP Final 30 September 2016 page 64). With specific reference to Luctons field, the covenant reserving it for educational and sporting use has been broken. If 300 or more dwellings are built on Luctons field, there will be no large space left to build a new school which will certainly be needed. (Neither would there be space to build a proposed sports hall.) Hence it is more logical to maintain the original purpose of the covenant on Luctons field and earmark it for educational and sporting purposes. This would have the added advantage of leaving some land construction-free for playing fields which could possibly be used by the community as well. It would leave more ground to soak up run-off water, avoiding the risk of flooding in the roads on the downward slope towards the underground line and the river Roding. 3)-Suggestions for other ways forward: There is extensive building work going on in Debden Estate (a large block of flats on the Churchill pub site, Langston retail park and houses in the garages at the back of the Broadway, for example). Most of the possible infill building has already been done on Debden Estate, apart from a number of derelict garage sites remaining around the estate (e.g. Chequers Road, Bushfields). If the proposed green spaces and infill sites are built on now, in a few years, more houses will be needed again and a new garden village will then have to be built. Rather than destroy the remaining green spaces, it would be more logical to start building a new garden village now, and avoid unnecessarily destroying the well thought-out design of Debden estate. Its residents deserved a healthy-giving, well-laid out estate when it was built and they deserve it no less now. Yours faithfully Gwendolyn Dellar (Ms)

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