

The Save Jessel Green Campaign

C/O 89 Jessel Drive
Loughton, Essex, IG10 2EQ



Louise St John Howe
Programme Officer,
PO Services, PO Box 10965,
Sudbury, Suffolk CO10 3BF

6th, February 2019

Dear Louise,

Re Epping Forest District Council SVLP
Inspector's MIQ Matter 1 (Legal Compliance) Issue 5

Thank you for your email of the 31st, January related to the updated HRA provided by EFDC dated 24th, January. Please accept this supplementary statement for the 21st, May hearing.

The Save Jessel Green Group puts its trust in, and supports the statements made by the Loughton Residents Association, Loughton Town Council and the Conservators of Epping Forest, which we have read and believe completely represent the best interests of Loughton and in particular Jessel Green, site LOU.5.

A major concern to SJG is EFDC paragraph 64 in their matter 1 Issue 5 statement which reads;

“Whether the method used to achieve that outcome is termed avoidance or mitigation is not relevant to legal compliance. Nonetheless, it is recognised that the consideration of avoidance is an appropriate 'first step' with respect to good development planning.”

While they say avoidance is a first step, experience suggests it will be their last choice. They know the price of everything and the value of nothing. If environmental damage is inflicted on Loughton and its environs it will be permanent and no sum of money will compensate. Wriggling on legal issues over HRA questions to justify poor site selection questions motivation. Avoid or avoidance, appears on 26 occasions in the revised HRA. Either mitigate or mitigation, 226 times.

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The updated HRA missed the opportunity to address these issues;

Re climate change they discuss build quality and flood concerns but have failed to note an HMG Commons Select Committee report in July 2018 recommending local authorities do more to preserve Green and open spaces and provide shady places to reduce the urban heat island effect.

From 25 October 2021, the ULEZ area will expand to include the inner London area bounded by the North and South Circular Roads. With Underground stations in the district sitting outside the North Circular it is certain that some drivers who normally go further into London will want to avoid the ULEZ charge and seek to park and ride from outside the North Circular. It is inevitable this will cause more pollution/congestion throughout the district and it has not been considered. Exacerbated if tube station car parks are lost.

The latest HRA ignores the impact of Epping Forest Retail Park in Langston Road which achieved full occupancy in early 2018 and had negative consequences. Changing from light industrial to retail by EFDC without consideration of the increased traffic has caused frequent congestion in Langston Road, Oakwood Hill, Chigwell Lane with tailbacks to M11 junction 5 and a long way up Rectory Lane. The volume of standing traffic at times is considerable and must affect air quality for Loughton, the nearby nature reserve off Oakwood Hill and the Epping Forest SAC.

Thanking you for this opportunity.

Yours sincerely,

Neil Bartlett
For and on behalf of the Jessel Green Campaign