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Follow Up Flag: Follow up
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I generally welcome and support the **main modifications** proposed in relation to South Woodford which, if implemented, would serve to improve the draft plan. My detailed comments are as follows:

MM3 & MM4 (paras 3.2.4 - 3.2.5) - Agree with proposed text added.

MM11 (PolicyLP1D) - Welcome reduction in the number of net additional new homes over the plan period from 650 to 430; supportive of the ambition in seeking to increase retail from 2,000 to 3,500 sqm but would question the realism in the context of generally retracting amounts of retail floorspace in town centres. Similarly, welcome the increase in employment floorspace (5,000 to 6,100 sqm) and massive increase in jobs from 100 to 600 but I am unclear where / how all these new jobs will be generated. Welcome reference in the supporting text to investment in health infrastructure - South Woodford Health Centre and Wanstead Hospital. In terms of education, I still have reservations about the physical ability in terms of space to expand existing schools but I am also aware that future demand (with an ageing population and younger people / families being able to afford to live locally) may not require additional capacity. I also recognise that, in an era of academy / free schools, councils have very little control over the provision of new school places.

MM12 (para 3.6.4) - Generally welcome revised text that seeks to justify designation an Investment & Growth area designation in explaining the nature of South Woodford's future balanced growth and development and the import of ensuring preservation of the special character of South Woodford. I suggest adding reference to positive social improvements in addition to economic, physical and environmental improvements.

MM13 (para 3.6.5) - Again, welcome reduction in number of additional new homes over the plan period and the emphasis on delivery of high quality developments.

MM14 (para 3.6.6) - Agree changes.

With regards **additional proposed modifications** I have one comment:

AM28 p81 Para 4.4.2 Insert to end of paragraph 4.4.2:

“Using the findings of the SFRA, a Sequential and Exception Test has been prepared to accompany the Local Plan. This demonstrates that both the strategic sites in Policy LP1, and the proposed opportunity sites listed in Appendix 1 pass these tests where necessary.”

As currently worded, I am not sure this entirely correctly reflects the process to be followed. The Council is required to apply the sequential test to all of the sites allocated in the Local Plan. A purpose of a Level 1 SFRA is to identify whether a more detailed analysis of flood risk is required where it is not possible to allocate all proposed development in SFRA Zone 1 areas.

Other comments

As discussed at the South Woodford oral session of the examination, the capacity of the Central Line remains a major concern. Whilst South Woodford may have a high PTAL this is largely meaningless if there is not the physical capacity on the trains and buses to accommodate additional demand. In addition to additional growth in South Woodford, as previously stated, account needs to be taken of the 11,400 net additional homes predicted in neighbouring Epping Forest District over the same period; many of these new occupants are likely to commute into London using the Central Line. Also, PTAL relates largely to radial accessibility into central London - it is not an accurate measure of the much poorer orbital public transport connections across north and east London.

Finally, in the list of site proposals, I note that there is still no reference to the former Woodford Football Ground off Snakes Lane East - surely this site that has remained vacant for 25 years ought to be allocated for some future land use?

Ken Bean