

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

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Method	Email			
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### Letter or Email Response:

Dear **....Redacted....** RE: CONSULTATION ON EPPING FOREST DRAFT LOCAL PLAN - LEE VALLEY REGIONAL PARK AUTHORITY COMMENTS Thank you for consulting the Regional Park Authority on the Draft Local Plan consultation document. This document is due to be considered by the Authority's Members at the Upper Lee Valley Regeneration and Planning Committee on the 15 December 2016. The following are officer level comments to meet the consultation deadline of 12 Dec 2016. The Authority's formal response will be forwarded as soon as possible after the committee. Key Draft Local Plan Policies of relevance to the Regional Park As set out in the strategic context for the draft Local Plan a substantial area of the Regional Park lies within Epping Forest District (3929.52 acres or 39.64%) and as such the Local Plan once adopted will be a major influence on future use of and development within the Park. Vision and Strategic Policies The Authority welcomes the detail included about the Lee Valley Regional Park, in the draft Local Plan chapter 'Strategic Context', and the specific reference to the Park Act identifying its requirements regarding the inclusion of the Authority's relevant Plan Proposals within local planning strategies and policies. Support for the "recreational aims" of the Regional Park within the draft Vision for the District is also noted. Reference to the Authority's vision needs updating to that agreed in 2010 as 'A World Class Leisure Destination'. The Local Plan does not however include a policy for the Regional Park. The significance of the Regional Park as part of the District's green infrastructure, its unique offer in serving the leisure, cultural, educational, access to nature and sporting needs of the public requires both recognition and support through policy. As stated in earlier comments at the Issues and Options stage the GLA definition of the Park as a Strategic Cultural Area (policy 4.5) in the London Plan is a useful framework and consistent with the Authority's Vision of the Park as a World Class Visitor Destination. A dedicated policy could provide support for the Authority's emerging strategic policies and draft proposals and those adopted for Area 5 of the Park Development Framework (PDF) which includes the Sewardstone area and Gunpowder Park. This would be in line with Section 14 of the Lee Valley Regional Park Act 1966. SP5 Green Belt and District Open Land The Authority notes and supports the emphasis placed on protecting the openness of the Green Belt in policy SP5 Green Belt and supports those changes to the greenbelt which are required to reflect the impact of planning decisions since the last green belt review over 20 years ago However there is concern about the appropriateness of other Green Belt amendments and the inclusion of a new policy designation, 'District Open Land' (DOL) for several areas currently designated as green belt within the Regional Park. On land south of Waltham Abbey the suggested alteration to the Green Belt boundary and its re-designation as DOL includes removing areas of land that are not proposed for new development. Some of these sites also fall within the Park - Town Mead leisure park and the waterway and land corridor adjoining the

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Ramsey Marsh Flood Relief Channel and Lee Navigation that connects the River Lee Country Park at Highbridge Street with Gunpowder Park to the south. Please refer to the Plan at Appendix C. The justification included in supporting text for this land being re-designated as DOL is undermined by the inclusion of this site and reflects an incorrect 'test' being applied from the National Planning Policy Framework (2012) which fails to understand the strategic function of green belts. Further, land within the Park serves a wider than local function, for example, the waterway corridor along the Navigation is an important element of the regions green infrastructure. Land within the Park to the north and south of these areas is designated as Green Belt. Removing these sites from the Green Belt appears unnecessary. The Authority supports the decision not to release land from the green belt to the west of Roydon and endorses the view that land to the west of the settlement is the most sensitive location in landscape terms and that development would be harmful to the setting of the Regional Park. The Authority is concerned however by proposals to amend the Green Belt to the south of Nazeing, just outside the Park boundary, in order to accommodate proposed residential site allocation. A large proportion of the site is identified in the Authority's adopted Park Plan (2000) as requiring protection from development as it adds a landscape context to the wider valley contained by the Regional Park. The Authority has objected to recent planning applications for residential development in this area on the grounds that it would adversely impact on the permanence and openness of the Green Belt and compromise the landscape setting of the Regional Park. SP6 The Natural Environment, Landscape Character and Green Infrastructure Additional text and changes are proposed to this section as follows: Policy DM1 'Habitat protection and improving biodiversity' which seeks to ensure all development deliver net biodiversity gain is supported. The SPA was designated where significant numbers of key species were found. However there are other areas that whilst linked functionally and used as alternative feeding or roosting areas, were not included in the designation boundary. The importance of these areas should be noted and protected by policy so that any impacts on them that may in turn affect the SPA features can be considered appropriately. Amendments to the second bullet are proposed as follows (shown in red font): DM1 B: Development proposals must protect and enhance natural habitats and areas of biodiversity, and should not negatively impact upon areas of international or national designation or functionally linked land within the district important for the key species. A direct reference to Local Wildlife Sites and their protection should also be made in policy. Bullet point F is considered rather vague and should be strengthened as follows. Survey evidence showing the absence of protected species demonstrates that a thorough approach has been followed. F. Where there are grounds to believe that a Protected Species, Priority Species or Priority Habitat may be affected by proposed development, applicants must provide survey information and site assessment to establish the extent of potential impact. District Wide Policies Employment Policies Policy E1 Employment Sites supports the redevelopment, renewal or extension of existing premises for employment use before identifying new sites. Land within the Park and the Green Belt at Moss Nursery, Nazeing (ELR-0099) has been identified as an extension to an existing employment site. This appears to be a new employment designation within the Park and within the Green Belt although part of the area shown has an established use providing for vehicle servicing and car spares. The strategic policies included in the Park Plan do allow for the redevelopment of sites such as this although the Authority would seek planning obligations to the benefit of the Regional Park if any application is made. Policy E3 Food Production and Glasshouses In 2012 the Authority supported the District Council in the commissioning of a report into the glasshouses industry. The report, "The Lea Valley Glasshouse Industry" included two recommendations of relevance to the Regional Park: "Large scale expansion will require new designations of E13 areas. To reflect traffic issues and the incompatibility of glasshouses and the Regional Park, designations should be considered to the east of Epping" i.e. outside the Park and that "the Council should consider the expansion of existing E13 designations outside the Park boundary". (Recommendations 2 and 3). It is unclear how this report has been used in the determination of the new policy which may, in the absence of a robust evidence base be unsound. E4 The Visitor Economy Further detail is required under Policy E4 to support future development and improvements at the Lee Valley White Water Centre (LVWWC). General text under paragraph 4.61 mentions the White Water Centre, which lies just over the border, near Waltham Abbey, and that it could be "a catalyst in the medium to long term to encourage sport and other tourism-related activities in the locality" Policy E4 offers support for high quality visitor accommodation and for upgrading existing visitor attractions, which is helpful in terms of the wider Park area, for example the River Lee Country Park and Lee Valley Park Farms. The Authority is developing the Lee Valley White Water Centre as the major family leisure destination in the south east. Working with our leisure trust, Vibrant Partnerships we will diversify its offer into 'extreme' sports. The centre attracts more than 330,000 visits and is the home to British Canoe's national performance centre for canoe slalom. The intention is that the regional and national event programme will be integral to our plans in the foreseeable future. Currently, the

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centre's offer reflects two phases of development. The first involved the creation of the centre as an Olympic venue; this operated for under two years until the completion of the second or 'legacy phase' in 2013. Both phases of development extended the visitor offer focused entirely on paddle sports with recent innovations such as the new beach. The Authority with Vibrant Partnerships is looking at plans for a third phase of development to secure the centre's reputation for extreme sports. Working with its partners the Authority has identified land on adjacent sites for further investment within an 'opportunity area' which would extend the existing curtilage to include the showground site; this should be identified in the draft plan and will be used as the basis of a masterplan with Borough of Broxbourne. Vibrant Partnerships working with the Authority is scoping the market to look at new attractions which could include zip wires, wave machine and extended beach area. An additional bullet point could be added to Policy E4 as follows: Opportunities for the sustainable development of the visitor economy will be supported where they are of a scale, type and appearance appropriate to the locality and provide local economic benefits, through the following measures ..... viii) support for development of high quality leisure facilities and activities in association with the adjoining Lee Valley White Water Centre to create a major family leisure destination within the south east at Waltham Abbey. The Authority was successful in agreeing with the borough of Broxbourne a joint approach which shows the potential for expansion at the centre which extends northwards but also to the east into the District. It is considered that this 'opportunity area' should be included in the draft plan. This will support the Councils initiatives to strengthen the local visitor economy. A plan Appendix D of the proposed opportunity area is included with this letter.

**Traveller Site Development** The Authority notes the Council's sequential approach to the allocation of sites for Travellers and Travelling Showpeople as set out in draft Policy SP2 Spatial Development Strategy 2011-2033 and policy H4 Traveller Site Development and supports the provision of land for Traveller sites as part of the development of new housing sites. However the sequential approach directs decision makers towards the regularisation of temporary and unauthorised sites first, intensification of existing sites and sites within the green belt before turning to new allocations/development sites. For the Regional Park, which within Epping Forest District is mainly green belt land (94.2%), this will place undue pressure on green belt sites within the Park, for example the four temporary Traveller sites at Carthage. Government guidance states that Traveller sites in the Green Belt, whether temporary or permanent are inappropriate development ("Planning Policy for Traveller Sites" August 2015). This is mentioned in supporting text for draft Policy H4 Traveller Site Development which highlights green belt designation as a consideration when assessing applications for Traveller site development for sites other than those allocated in the Plan. It would seem as drafted that the implications of the policy counter adopted Government policy and would be prejudicial to the Authority's commitment to improve landscape at Carthage. It could be considered 'unsound'.

**Biodiversity and Green Infrastructure** The Authority supports the Development Management policies for habitat protection and improving biodiversity DM1 and for the Lee Valley SPA DM3. The Park area within Epping Forest District contains a diverse and rich ecology including part of the Lee Valley SPA and Ramsar site, the Cornmill Stream and Old River Lea and Waltham Abbey SSSIs and a number of Local Wildlife sites. It is important that development within or adjoining the Park delivers a net biodiversity gain and that appropriate survey information is included when an application is submitted. Suitable monitoring of any required mitigation, compensation and offsetting must also be effective for it have any purpose. Policy supporting the extension, maintenance and enhancement of Green Infrastructure in the District, set out as part of policy SP6 'The Natural Environment, Landscape Character and Green Infrastructure' is welcomed. It would be helpful to identify both the Regional Park and Epping Forest as major elements within the District's green infrastructure as part of this strategic policy. Reference to The Lea Catchment Nature improvement Area (NIA) should be incorporated into this section of the Local Plan. It is endorsed by the Herts Local Nature Partnership and seeks to establish a joined up and resilient ecological network at a landscape scale throughout the Lea Valley. The 5 key aims of the NIA, as set out below:

- To restore, recreate and link characteristic ecological, hydrological and landscape features to fully integrate the Lea floodplain corridor
- To improve the ecological management of designated sites within the Lea Valley
- To enhance and enlarge key biodiversity sites in the Lea Valley
- To begin to achieve good ecological status of the River Lea and tributaries
- To increase awareness and understanding of the biodiversity of the Lea Valley and to activate participation in its conservation

This would strengthen Green Infrastructure planning in the District and support Policy SP6: 'The Natural Environment, landscape Character and Green Infrastructure'. Policy relating to 'Places' The Authority supports the policy focus on key places within the District particularly the policies which are aimed at revitalising centres adjacent to the Regional Park such as Waltham Abbey, Nazeing, Roydon and Sewardstone. More detail should be included about the Regional Park and its relationship to these areas. The Local Plan should promote and help to enhance its role in providing opportunities for,

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and access to, healthy activity and group events, enjoyment of nature, informal outdoor recreation and leisure facilities, e.g cycling, sailing, and angling for all members of the public. Waltham Abbey Gardens and the town centre itself are an important gateway into the River Lee Country Park, and this has been identified through the draft PDF Area 6 Proposals. Support should be included for improved visitor facilities and related infrastructure within the River Lee Country Park at Fishers Green and the Lee Valley Park Farms, and within the Royal Gunpowder Mills site. The relationship between the Park and the settlements of Nazeing and Roydon should be highlighted. Infrastructure improvements such as access into the Park from Roydon station, or via additional cross valley public transport provision on Nazeing Road should form part of the infrastructure delivery plan for these areas. Improvements to the Crooked Mile as a key route serving the River Lee Country Park, particularly for cyclists, has long been an ambition of the Authority and requires joint working with Essex County and other stakeholders. This should be promoted through the Local Plan. Reference to the recreational and biodiverse open space assets within the Park at Sewardstone should be included within the vision statement. Response to call for sites In January 2016 officers responded to the Council's 'call for sites' with the submission of two sites on the edge of Waltham Abbey, Langley and Mile Nursery, which lie on the Crooked Mile. Whilst both of these lie in the green belt and Regional Park they are occupied by commercial uses. Through its greenbelt review the District Council dismissed the inclusion of both sites. The comment included in the schedule is as follows: 'Although this site was available, it was judged that other sites were preferential in terms of the SSM hierarchy and their achievability and if allocated would cumulatively provide the desired quantum of development in this settlement'. In short, whilst other sites have already been allocated, in the local planning authority's view these two are not required. However, importantly the current designation of the sites as green belt was not a determining factor in preventing their inclusion for housing and was dismissed as a constraint though your assessment process. The Authority would like to retain these two sites in the 'call' for consideration by the District Council as it reviews the results of consultation as part of its preparation for the Regulation 19 consultation which will commence in 2017. These sites have the advantage of currently being occupied on short leases and could become available for housing development within the next 2 years; they are deliverable as housing sites. They should be de-designated from the greenbelt and allocated for housing. Infrastructure and Delivery The Authority looks forward to working with the Council on the development of the infrastructure delivery plan and in identifying opportunities to secure future improvements to green infrastructure in line with strategic policy SP6, and the detailed Green Infrastructure strategy, and in particular to improve access to the Regional Park for cyclists and pedestrians. Although the Council is in the process of reviewing the potential offered by a Community Infrastructure Levy and has not yet adopted a charging schedule the Authority would wish to see specific reference to the Regional Park in the schedule if and when this is drafted. The Authority would welcome feedback and further discussion on the comments made above. Yours sincerely **...Redacted...**

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