



**Epping Forest
District Council**

www.eppingforestdc.gov.uk



**Representation form for Submission Version of the Epping Forest District Local Plan 2011-2033
(Regulation 19 publication)**

This form should be used to make representations on the Submission Version of the Epping Forest District Local Plan which has been published. Please complete and return by 29 January 2018 at 5pm. An electronic version of the form is available at <http://www.efdclocalplan.org/>

Please refer to the guidance notes available before completing this form.

Please return any representations to: Planning Policy, Epping Forest District Council, Civic Offices, 323 High Street, Epping, Essex, CM16 4BZ

Or email them to: LDFconsult@eppingforestdc.gov.uk

BY 5pm on 29 January 2018

This form has two parts – Part

A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Please attach any documents you wish to submit with your representation

Part A

1. Are you making this representation as? (Please tick as appropriate)

a) Resident or Member of the General Public or

b) Statutory Consultee, Local Authority or Town and Parish
Council or

c) Landowner or

d) Agent

Other organisation (please specify)

CPRE Essex

Tel/Fax:

Email:

December 2017

2. Personal Details

3. Agent's Details (if applicable)

Mrs Patricia Moxey

Vice Chairman, CPRE Essex

Email:

December 2017

Part B – If necessary please complete a separate Part B form for each representation

4. To which part of the Submission Version of the Local Plan does this representation relate? (Please specify where appropriate)

Paragraph Policy SP6 Policies Map

Site Reference LOU R5 Settlement Loughton

5. Do you consider this part of the Submission Version of the Local Plan:
 *Please refer to the Guidance notes for an explanation of terms

a) Is Legally compliant Yes No

b) Sound Yes No

If no, then which of the soundness test(s) does it fail*

Positively prepared Effective

Justified Consistent with national policy

c) Complies with the Yes duty to co-operate No

6. Please give details of why you consider the Submission Version of the Local Plan is not legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments

I am writing on behalf of CPRE Essex to make the following comments on proposals within the Draft Local Plan in respect to the proposed developments on LOU R5 (Jessel Green).

POLICY SP 6 Green Belt and District Open Land

The preamble states “In accordance with the national planning policy a Local Green Space designation of “District Open Land” is proposed.”

Policy SP 6 B. confirms “The same level of protection will be applied to areas of District Open Land as is applied to Green Belt. The key characteristics of District Open Land are their openness, permanence, local significance, wildlife value and/or public accessibility.”

CPRE Essex points out that in Section 4.52 in Policy DM 6 it is stated that “Communities are able to seek to designate, and thus protect, Local Green Space which is especially meaningful to a community, local in character and not extensive in size”.

With reference to this and NPPF 76 and 77, Jessel Green was one of a number of local sites submitted to Essex County Council in December 2013 for registration as a village green. These applications have been delayed by a legal issue, but the substantial evidence provided particularly for Jessel Green supports and justifies its designation

(Continue on a separate sheet if necessary)

now as a Local Green Space. This makes Jessel Green inclusion in the list of development sites for Loughton a contradiction.

The key result and top priority for the District over the next 20 years as set out in the original Local Development Framework Community Visioning Results report was:

- To protect and enhance green spaces whilst encouraging the growth of local jobs and businesses. [*source: Report to the Cabinet LDF-020-2010/11, 7.2.11 p1*]

Sadly, in this Draft Local Plan there is the very opposite of that high-level vision, with proposed loss of valued open spaces within the urban areas.

The three key issues for the residents of Loughton are:

1. **Urban Intensification.** CPRE Essex is deeply concerned about the proposed loss of much valued green spaces and developments on car parks.
2. **Inadequate Infrastructure Provision.** This Plan contains little or no vision or recognition of the current problems facing residents and the detrimental effects of excessive additional development across the whole of the district. Depending on other agencies to deliver the vital infrastructure improvements, over which Epping Forest District Council has little or no control is a recipe for future problems, there is a serious deficit in overall infrastructure provision that any number of s106 agreements or application of the infrastructure levy on individual sites cannot counteract. CPRE Essex opposes large scale built development unless adequate infrastructure is available before or at the same time as development.
3. **Climate change Mitigation.** There are growing concerns about the impact of observable climate change on the well-being of residents within urban areas. As summer temperatures rise, the urban heat islands retain the warmth causing considerable discomfort to those living there. This has a greater impact on the elderly and children as well as people on medication. (In 2003 during the heatwave in central France 70,000 people died, many of them elderly as they are less able to regulate their own temperature control).

One means of reducing daytime temperatures is to grow more trees within urban areas as these help to reduce the ambient temperature. Trees require adequate space in which to flourish and if planted within a green space the impact of temperature reduction is increased. The larger the space, the greater the impact on the surrounding built up area. To build on any green spaces within the urban areas must be avoided as they already play a significant role in maintaining health and wellbeing, but their value will increase in the future. A trailblazer for such forward thinking help control high summer temperatures is Manhattan, in New York where a massive greening programme is underway. Improved insulation of buildings, reflective surfaces and the use of green roofs must be considered at the design stage of any new development.

Loss of Green Spaces

The proposal to build on the existing urban spaces in Loughton, (Sites SR-0356, SR-0358 and SR-0361) is contradictory to the majority of responses to the Issues and

Options consultation regarding Green Belt and Landscape. 77% of those responses stated not all relevant issues for the Green Belt and landscape had been identified. A large majority were opposed to the principle of development in the Green Belt, particularly before all brownfield land is reused. They raised concerns about London sprawl and suburbanisation of settlements in the south of the district. A majority of respondents favoured development away from the Central Line in the two similar choices.

CPRE Essex opposes development on part or the whole of the three open spaces on the former LCC estate (SR-0356, SR-0358 and SR-0361).

Evidence:

The overwhelming planning evidence for this objection is contained in a number of recent reports and in evidence collected from local people.

1) Reference is made to Section 171 of the NPPF which says:

Health and well-being

171. Local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports, recreation and places of worship), including expected future changes, and any information about relevant barriers to improving health and wellbeing.

2) The document published by Essex County Council, "A profile of people living in Epping Forest, Organisational Intelligence", dated April 2016 provides evidence to support this objection. It states that

i. the Loughton Broadway ward is an area with high deprivation and health inequalities; ii. Loughton Broadway (23.2%) and Loughton Fairmead (22.0%) are two of the four wards in the District with a higher than average percentage of children living in low income families.

In recent years a number of reports have been produced to highlight the value of green spaces. Given the details from the 2011 Census, this value will be higher for the Loughton wards of Broadway and Fairmead.

3) In 2013, the report '**Green Spaces: The Benefits for London**' identified the following benefits that open spaces deliver:

- **Economic Benefits** – green spaces result in cost savings for government related to health expenditure, can attract businesses to locate and can encourage tourism;
- **Health and Well-being** – green spaces can play a role in promoting healthy lifestyles, reducing stress and preventing illness;
- **Social Inclusion, community development** – green spaces give people the chance to participate in design, management and care of local spaces, fostering local pride. They are places to socialise, and because access is free, provide an affordable alternative to other leisure activities as well as allowing children to develop socialisation and motor skills through play;
- **Education and Lifelong Learning** – green spaces provide an outdoor classroom for schools, and provide work experience and learning opportunities in environmental management;
- **Environment and Ecology** – green spaces help counter pollution, cool the air,

increase biodiversity and provide wildlife corridors, serve as 'lungs' for towns and cities, absorb noise, and lessen rainwater runoff;

- *Heritage & Culture – green spaces are part of the heritage and culture of local communities. They provide venues for local festivals and civic celebrations.*

Green spaces must be located within easy reach of the communities they serve. Five minutes' walk would be considered easy reach. To say that Epping Forest is in easy reach of communities in the Debden Estate is unrealistic as many people prefer to step outside their own front doors into a nearby accessible green space. To reach Epping Forest requires the use of some form of transport adding to congestion and pollution. The CoL as Managers of Epping Forest have expressed concerns about the carrying capacity of the Forest in terms of visitor numbers and the consequent impact on the Forest itself.

4) Natural England Commissioned Report NECR067, Green space access, green space use, physical activity and overweight published in April 2011.

The conclusion of this report reads:

This study has provided new evidence that good access to urban green spaces is associated with higher use, higher physical activity levels, and a lower likelihood of being overweight or obese. Informal physical activity is an important component of overall activity levels, and provision of facilities such as green spaces which can be used for a wide range of physical activities, has population wide benefits. It is important that supportive environments are available to facilitate active lifestyles, and our findings suggest that green spaces may provide a valuable resource in urban areas. See

<http://publications.naturalengland.org.uk/publication/40017>

5) The Houses of Parliament Parliamentary Office of Science and Technology issued in October 2016, a POSTnote no 538 on Green Space and Health. The key points include:

6)

- Physical and mental illnesses associated with sedentary urban lifestyles are an increasing economic and social cost.
- Areas with more accessible green space are associated with better mental and physical health.
- The risk of mortality caused by cardiovascular disease is lower in residential areas that have higher levels of 'greenness'.
- There is evidence that exposure to nature could be used as part of the treatment for some conditions.
- There are challenges to providing green spaces, such as how to make parks easily accessible and how to fund both their creation and maintenance.

See <http://researchbriefings.parliament.uk/ResearchBriefing/Summary/POST-PN-0538>

7) Public Health England Health Equity Evidence Review 8:

Local action on health inequalities: Improving access to green spaces published in September 2014 provides further evidence on the value of green spaces and the health benefits. It refers to the importance of accessibility and the impact on health. See https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/357411/Review8_Green_spaces_health_inequalities.pdf

8) The Land Trust: The Value of Our Green Spaces published in January 2016

believes High quality well maintained green space is good for everyone and as a land owner and management charity, we know that it:

- Supports the natural environment and enhances biodiversity
- Provides opportunities for people to improve their health and wellbeing
- Provides educational opportunities
- Contributes to uplifting the economic value of communities
- Encourages community cohesion.

<http://thelandtrust.org.uk/wp-content/uploads/2016/01/The-Value-of-our-Green-Spaces-January-2016.pdf>

It is also important to note that The Strategic Flood Risk Assessment Level 1 Update 2015 (SFRA) identifies surface water run-off as the greatest risk to the District with regard to flooding. Whist the Council currently has in place one Surface Water Management Plan for Loughton, Buckhurst Hill and Theydon Bois (2016), this is operational with regard to the current location of open land which can absorb rainfall reducing the risk of flooding. Covering any of the current open spaces with built development will cause changes to this Surface Water Management Plan. The upward movement of rain clouds over the high ground of the Epping Forest ridge already produces a greater amount of precipitation than elsewhere in Essex and with climate change this pattern of heavy downpours over the urban areas within the district is likely to be intensified.

CPRE Essex considers the Plan could be made sound by removing Site LOU R5 from the Plan.

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7. Please set out what change(s) you consider necessary to make the Submission Version of the Local Plan legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

CPRE Essex considers the Plan could be made sound by removing Site LOU R5 from the Plan so that the residents of the local community can continue to enjoy this open area safe in the knowledge that they and future generations can enjoy the services that it provides.

Retention of green open spaces within the urban footprints of all settlements within the district will reduce the impact of visitor pressure on other protected public recreational spaces such as Epping Forest, Lea Valley Park and the Roding Valley Meadows. See Policy DM 2 Epping Forest SAC and the Lee Valley SPA

CPRE Essex agrees with the CPRE national policy which advocates a “brownfield first” approach and would therefore wish to be assured that all brownfield land in the District has been identified through the compilation of a Brownfield Land Register in advance of necessitating alterations to the boundary of the MGB.

The proposal to consider Jessel Green as site suitable for development goes against Policy DM 1 Habitat protection and improving biodiversity and also Policy DM 3 Landscape character, ancient landscapes and geodiversity; as any changes to the openness of this site reduces its landscape character and minimises the opportunity for study of the geomorphological features demonstrated at this site.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

(Continue on a separate sheet if necessary)

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the hearings

x

Yes, I wish to participate at the hearings

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9. If you wish to participate at the hearings, please outline why you consider this to be necessary:

To personally augment the reasons set out above if the Inspector wishes to raise any queries.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.


10. Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination (Please tick)

Yes No

11. Have you attached any documents with this representation?

Yes No

Signature:



28 January 2018

Date: