

**Epping Forest District Council**

Planning Policy Team  
Neighbourhoods Directorate  
Civic Offices  
323 High Street  
Epping, Essex CM16 4BZ  
Jan 29.2018

EPPING FOREST DISTRICT COUNCIL NEIGHBOURHOODS	
REC'D	29 JAN 2018
ACK	.....
REFERRED TO	.....

Dear Sir,

**Ref: EFD Local Plan Submission Version 2017**

On 12<sup>th</sup> December 2016, the Friends of Epping Forest responded to the Draft Local Plan for Epping Forest District. A copy of that submission is enclosed. It will be seen that our support for the overall vision set out for the district was, and remains, qualified by a number of objections and concerns about detailed policies.

Since 14<sup>th</sup> December 2017, a Sustainability Appraisal and a Habitats Regulation Assessment have been produced. The latter is particularly salient to our interests. The time-scale allowed for the dissemination and debate of this additional information within an organisation of this size has been tight.

Our further comments concerning these additions and amendments are as follows:-

**In the Habitats Regulation Assessment**

1. The need for a mitigation strategy is a recurring theme  
Para 3.7 "additional recreational activity resulting from new residential development 4km of the SAC ... would result in a likely significant effect, without mitigation"  
Para 3.8 states that EFDC Harlow, Uttlesford and East Herts have committed to producing a strategic mitigation plan for Epping Forest SAC through a Memorandum of Understanding made in February 2017.  
  
There is no definition of what this mitigation strategy will comprise and the first step of the forward action plan, an updated visitor survey of the SAC, was not commissioned until November 2017. We would have assumed the mitigation strategy would be in place before the examination of the plan.
2. The Habitats Regulation Assessment is focussed on the SAC, not Epping Forest as a whole. The SAC accounts for two thirds of the Forest area. Our concern is for the Forest as a whole and its value in both environmental and recreational terms. Its ecological value is not confined to the SAC. This is particularly relevant to the northern extremities of the Forest which are likely to draw traffic and footfall from any development between Harlow and Epping.
3. Para 3.10 Urbanisation, refers to Policy DM2, "planning applications within 400 metres of Epping Forest SAC will be required to submit a site-level Habitats Regulation Assessment." We do not believe that 400 metres is a sufficient distance.

4. We acknowledge pollution problems arising from congestion at Wake Arms Roundabout and Woodredon Hill, approaching M25. As these problems cannot be addressed by any road reconfiguration which takes Forest land, it is all the more important to study and address the issue of traffic drawn across the whole Forest area.
  
5. We note that it is recommended that all allocations over a certain size, in Loughton, Epping, Waltham Abbey, Theydon Bois and Chigwell should consider any potential to create own on-site accessible green space and that this is facilitated by Policy DM2 in the plan; which we welcome. It therefore seems totally illogical that within the Green Infrastructure (SP6), building is proposed on well-used existing green areas within the existing residential areas of Jessel Green, Borders Lane, and Hill House to which we object.

Yours faithfully,



Judy Adams  
Chairman  
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**EFDC Local Plan Response**

Directorate of Planning and Economic Development  
Forward Planning  
Epping Forest District Council  
Civic Offices, High Street  
Epping  
Essex CM 16 4BZ

12 Dec 2016

Dear Sir,

**Re: EFDC Local Plan Response**

The Friends of Epping Forest, the organization on whose behalf I am making the response to this Plan, founded in 1969, is a registered charity with over 1,400 members. It is dedicated to the protection of Epping Forest in the spirit of the Epping Forest Act 1878 and aims to further the understanding, knowledge and appreciation of this important ecological and recreational site.

Our response focusses on the impact /potential impact of the Plan on Epping Forest.

**Draft vision and objectives-** Whilst the Friends of Epping Forest supports the overall vision that the Local Plan sets out for the District, this support is qualified by a number of objections and concerns about the detailed policies, which are raised in this letter.

The vision ought to be strengthened in respect of nature conservation and the green spaces, even though in some cases, there is further commitment contained in the more detailed policies.

The vision clearly states the Plan's intention in respect of Epping Forest and the Lee Valley Regional Park Authority. However it fails to mention in respect of the Lee Valley its highly significant nature conservation value with SSSIs and a Special Protection Area. There should in our view be a statement in the vision of the District's commitment to ensure that it too is conserved and enhanced as Epping Forest.

Furthermore, the District sites of nature conservation importance and green spaces should also be mentioned within the vision. This inclusion would be consistent with the Community Visioning Report (Report to Cabinet LDF-020-2010/11 p1), which said as the first priority 'to protect and enhance green spaces whilst encouraging the growth of local jobs and businesses'.

In addition, an increasing focus for nature conservation has been for green spaces and areas of nature conservation to be bigger, better and more joined up, developing the connectivity between sites, increasing their value for wildlife and people (Natural Environment White Paper, June 2011, DEFRA); hence it is essential to include within the

vision the **totality of the green resource** in the District.

### **Strategic Policies**

**SP1 - Sustainable development** – The Friends welcome the presumption in favour of sustainable development to achieve economic, environmental and social progress.

**SP2- Spatial Development Policy** – We welcome the statement that new areas for housing are better focused on the main settlements in the District, including a major focus around Harlow, given its potential for improved infrastructure. The particular main settlements immediately bordering the Forest include Epping, Loughton, Buckhurst Hill, Theydon Bois, Thornwood, North Weald and Waltham Abbey.

The 11,400 houses proposed is a very significant increase and will impact considerably on the Forest in a variety of ways:

Increased traffic brings congestion, along with noise, chemical and light pollution on Forest roads. Many Forest roads are feeders to the M-Way network or rat runs to the Central Line Tube and commuter parking areas for main line trains.

Increased pollution damaging the health of the Forest ecosystems

Increased pressure for car parking from commuters and residents

Increased visitor pressure on the Forest, for example off road cycling during the day and at night, where damage to tree roots and soil erosion may lead to death of trees, particularly in areas with shallow soils and on hilly terrain. Lights at night lead to disturbance of wildlife.

The loss of underdeveloped land encircling the Forest (much of which is Green Belt) removes a buffer to the Forest with the potential loss of biodiversity, amenity including views and some leisure activities.

**SP3- Strategic Allocations around Harlow** – those to the south and east are most likely to have a direct effect on the Forest, in respect of landscape, traffic and amenity.

**SP4 – Place shaping** – The strong commitment made to generous, well connected and biodiversity rich green space provision, along with the policy to extend, enhance and reinforce strategic green infrastructure and public open space, along with development that enhance the natural environment is welcomed.

**SP 5 – Green belt legislation** has been the only successful protection of the countryside from urban sprawl in the post war period, by keeping land permanently open. The Friends are opposed to the loss of Green Belt. Whilst the percentage may appear to be low 1.5%, it is setting a precedent for further erosion of Green Belt in future.

Loss of Green Belt land is particularly significant and should be resisted;

a) where an irregular boundary results, increasing the vulnerability of Green Belt land between two development areas.

For example at Waltham Abbey (SR0099 and SR0104). When Parklands Estate and the Waltham Abbey Relief Road were built, Green Belt land was released by Geoffrey Rippon, Minister for the Environment, and the public were told that the new road formed a natural boundary to the town, affording wide views across Green Belt countryside. The proposed change imposes a jagged edge to the Green Belt which 'asks' to be rounded off in the future.

b) where it is outside or beyond existing development boundaries, including railway lines, motorways or some distinctive landscape feature; for example;

*Theydon Bois*, where expansion of Theydon Bois is proposed on the eastern side of the railway (SR-0026C), over the railway which forms a natural village envelop of Theydon Bois, setting a precedent to develop towards Abridge and this should be resisted on landscape grounds.

*Waltham Abbey*, where development is proposed south of the motorway SR-0061B- a natural boundary of the Town to the south

*\*Page 84, paragraph 4.116 also acknowledges the vulnerability of Epping Forest and the need to provide alternative spaces and corridors to relieve pressure on it. We firmly believe it is essential to maintain green links between Epping Forest and the Lee Valley Regional Park, particularly in this area.*

*Epping*, at Bury Road (a boundary between Epping and the Copped Hall estate). SR-0132Ci is to the west of Bury Road, a natural boundary for development of Epping, and development here should be resisted.

**District Open Land-** this proposal is welcomed. The key characteristics ought to include landscape value.

**SP6-The Natural Environment, Landscape Character and Green Infrastructure**

This policy is to be welcomed.

Section D - Green infrastructure is also of value to biodiversity (Policy DM1) and reference to this ought to be included.

In addition, roadside verges could also be included as a green infrastructure asset. Many of these have been lost by haunching when roads have been resurfaced, obliterated by massive agricultural vehicles, mown by householders (even in conservation areas), to the detriment of the natural flora and its attendant invertebrate population. There should be a policy acknowledging the value of natural verges, which is incorporated in mowing regimes and which prohibits intervention by householders, in the same way that street trees are protected from unofficial pruning.

The evidence for the value of open/green spaces and green infrastructure is overwhelming. The values of green open spaces include health and wellbeing, leading to economic benefits, social inclusion and community development in addition to education

and lifelong learning, environment and ecology. The evidence emerging from e.g. Houses of Parliament Parliamentary Office of Science and Technology (October 2016) highlights for example that areas with more accessible green space are associated with better mental and physical health.

#### Loss of existing green space

The proposals to build on green space within built development is best illustrated in Loughton, where the Plan proposes loss of amenity space within existing housing developments; notably Jessel Green and the Playing Fields along Borders Lane. This will lead to a local deficit in green space provision and the neighbourhood will lose the benefits of living close to an open space, potentially placing pressures on other areas, including Epping Forest.

In Waltham Abbey within the Ninefields estate, the proposed Hill House development (SR-0385), also involves loss of green space.

#### **District wide Policies-**

##### **E4 - The Visitor Economy**

The 'natural' opportunities provided by Epping Forest and the Lee Valley Regional Park are very significant, but are finite. There is not capacity for an ever increasing number of visitors. I do not think that there has been a study of the potential and indeed the carrying capacity of these resources, in respect of biodiversity, landscape and amenity. In order to meet many of the other policy aspirations of the Plan, including sustainability, there will need to be a consideration of carrying capacity, so that we do not destroy the very assets we seek to protect. Epping Forest currently provides for circa 4.5 million visits per year.

##### **T1- Sustainable Transport Choices**

The aspiration to promote transport choice is laudable. However the infrastructure required, as with other developments, demands land, requires assessment etc. and this too must be sustainable. It was intriguing to note that the photo supplied for this section was leisure cycling, not cycling for transport, making yet very different demands on the environment.

#### **Development Management Policies**

##### **DM1 – Habitat protection and improving biodiversity**

Whilst paragraphs A and B provide a very strong policy in respect of habitat protection and improving biodiversity, paragraphs C,D,E and F, tend to dilute that policy; leaving future decisions to 'deciding' benefits, weighing up 'need', outweigh' etc.

DM-2 and DM 3 – Agreed.

##### **DM4- Suitable Natural Green Space and Corridors**

Developments which have adverse impacts on the SAC should not be pursued and were they to be approved; the mitigation should first contribute to the SAC.

DM5 – Agreed.

DM6 – Agreed

DM9 – High quality design – Mention should be made of native species, which will enhance the biodiversity value and also reduce the risk of disease. In addition, the nature and extent of lighting should be included, given its potential to affect biodiversity as well as amenity.

### **Infrastructure and Delivery**

The Plan appears to use a broad brush approach with little or no vision or recognition of the current problems facing residents due to infrastructure deficits and the adverse effects of additional development throughout the District. Much of the vital infrastructure improvements (e.g. roads, railways, public transport, car parking) are reliant on other agencies, over which Epping Forest District Council has little or no control. The deficit in overall infrastructure provision is unlikely to be solved through S106 agreements on individual sites. These deficits, notably in utilities and communications affect the Forest, along with Community, Leisure and Cultural facilities which will impact on Forest use, if there is an inadequate supply in the District. Any urban intensification should not take place, unless adequate infrastructure is available before or at the same time as development.

### **Car parking**

Car parking is an essential element of present day living. In addition to parking by residents in local roads, many commuters drive mainly into Epping and Loughton and the fringes of Epping Forest to park.

Given the increased numbers of houses, an increased level of parking is required. If the proposal to build on existing car parks is pursued, larger car parks will be required to accommodate the resident parking needs along with increased commuter parking.

During the construction phase, some provision will need to be made for parking as the present demands are bringing more parking along residential streets and attempts to park in Forest car parks, which are only provided for the better enjoyment of the Forest.

### **Summary**

We ask that the commitment to green space be strengthened, given its multi- functional contribution to communities and the environment.

Loss of Green Belt should be resisted and brownfield sites should be used before any consideration of loss of Green Belt land.

We ask that particular proposals within the Green Belt should be strongly resisted, where they involve building beyond the town or village envelop, as defined by an existing 'natural' village boundary (road or rail) and where the loss of Green Belt land creates a boundary, which presents an increased opportunity for further reduction of the Green Belt in future.

We have also included a number of specific additions that we would ask you to take into consideration.

Yours faithfully,

A handwritten signature in black ink that reads "Judy Adams". The signature is written in a cursive style with a large initial 'J'.

Judy Adams  
Chairman

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