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23rd December 2018

Dear Alison

**RE: CONSULTATION ON EPPING FOREST DRAFT LOCAL PLAN
REGULATION 19 - LEE VALLEY REGIONAL PARK AUTHORITY
COMMENTS**

Thank you for consulting the Regional Park Authority on the Draft Local Plan consultation document.

This document was considered by the Authority's Regeneration and Planning Committee on the 18th January 2018 and this letter represents the Authority's formal response

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

Whilst the new vision for the District references the 'recreational aims' of the Regional Park, this should be revised to refer to the Authority's statutory purpose which includes in addition to 'recreation', references to both 'leisure and nature conservation'.

General text included at paragraphs 2.18-2.24 'Strategic Policies of the Local Plan,' provides a helpful context for the Authority but needs revision to include references to the Authority's adopted vision that the Park is a 'world class leisure destination' supported by adopted series of strategic aims as follows:

A Park:

- that is a high quality and regionally unique visitor destination
- that delivers a range of high quality opportunities for sport

- that delivers a high quality biodiversity resource for the region
- that helps people improve their well being
- landscape that embraces the physical, cultural and social heritage of the area, and
- that contributes to the environmental sustainability of the region.

This was agreed after extensive public consultation in 2008-10 and these suggested changes should be included in a revised draft plan.

SP6 Green Belt and District Open Land

The Council's draft policy to protect the openness of the Green Belt is welcomed. However, the plan should draw a distinction between greenfield greenbelt where protections should be maintained and 'previously developed land' which if released for new development could have considerable value in supporting the districts draft employment and housing policies but without adversely impacting on 'openness'.

The Authority has during the local plan process supported the release of sites at Mile and Langley Nurseries which are defined as 'previously developed' with lawful use for commercial purposes. These sites lie within the 'village envelope' of Waltham Abbey; they lie in a sustainable location for new development. The principle of their development for housing was agreed in pre application advice included in a letter which is attached as an appendix to this letter. They would have to be de-designated from the green belt. It is unclear the logic of not including them in the housing site allocations for this settlement. Accordingly, the Authority requests that these are considered in site allocation for housing. This would have the effect of reducing the extent of land required from other 'green field' sites which lie adjacent to this centre in the green belt.

The Authority welcomes the deletion of the designation of land in the Regional Park as 'District Open Land'.

Food Production and Glasshouses

The Council is proposing a criteria based approach for new or replacement glasshouse and associated packhouse development, policy E3. This policy has been revised since the draft included in the Regulation 18 version to include reference to combined heat and power plants and ancillary low carbon generation. The actual criteria has been revised with the effect that it weakens the level of 'environmental protection' given to the Regional Park in the event of large scale glasshouse development. It is suggested that these references are retained in line with the Regulation 18 draft.

Gypsies and Travellers

The Council is proposing a 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. This approach includes the provision of land for Traveller sites as part of the development of new housing sites which address some of the concerns previously raised by the Authority.

However the sequential approach looks first at the regularisation of existing sites with temporary permissions or other unauthorised sites, then intensification and extension of existing sites, followed by appropriately located new sites outside the Green Belt, and then new sites in the Green Belt which are appropriately located in terms of healthcare, education, and other services. Provision of sites as part of new residential development is the last stage in the process. The current wording of the policy differs from that included in the Regulation 18 draft with criteria used for assessing the degree of impact of applications shifting from whether the site is located in the Green Belt, an issue of principle, to 'any impacts on the Green Belt'. This shift runs counter to government advice in government guidance issued in August 2015. The original drafting included in the Regulation 18 plan should be retained.

Biodiversity and green infrastructure

The proposed changes are broadly in line with the suggestions made by the Authority in response to the Regulation 18 draft plan although it is considered that a specific reference should be made to the Authority's intentions to support the development of a new replacement building to serve visitors at the Bittern Information Point at Fishers Green as the Authority has commenced feasibility work for a revised scheme.

The Lee Valley Biodiversity Action Plan (BAP) 2000 should be referenced as part of the 'Key Evidence' listed at para 4.8 of the draft Local Plan and account should also be taken of the revised BAP currently out for consultation and due to be finalised by March 2018.

Further minor changes are needed at paragraph 4.11 to ensure adequate, up to date ecological information is supplied as follows: Amendments shown in red and strikethrough –

"In order to understand the impact of development proposals on protected species and habitats and potentially valuable habitat for protected species it ~~may~~ will be necessary to require detailed ecological survey information and an impact assessment to enable the Council to judge the proposal and how effective measures to mitigate or compensate any harm might be. ~~This will depend on the level of existing data available....~~"

The Justification text (para 4.14) refers to situations where there is insufficient information provided regarding the ecological status of a site, its management and mitigation. However as biodiversity is a material consideration, sufficient survey work and information should be provided by developers from the outset. The wording at para 4.14 undermines the policy that follows and should be amended.

In terms of the Policy DM1 'Habitat Protection and Improving Biodiversity', there should be a minor amendment to clarify that sub section D about the mitigation hierarchy also applies to local wildlife sites identified under sub sections C. Policy under sub section E requires a minor amendment to wording at the end of the second sentence as follows: "require that monitoring is undertaken...and to ~~make-sure~~ ensure that any mitigation, compensation and offsetting is effective in the long term"

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 3.70 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 plans in the foreseeable future.

Currently, the 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. A series of temporary permissions are being used to 'test' the market for extending the offer at the site.

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. A draft ITT has already been shared with officers and the work will be underway in March.

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.

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.

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.

Draft visions and policies which are aimed at revitalising places such as Waltham Abbey District Centre and improving facilities at smaller settlements such as Nazeing and Roydon are to be welcomed. However more detail should be included about the Park and its role in providing opportunities for, and access to, healthy activity, enjoyment of nature, informal outdoor recreation and group events and leisure facilities, e.g. cycling, sailing and angling. Infrastructure improvements such as access into the Park from Waltham Abbey, from Roydon station, or via public transport on Nazeing Road should form part of the infrastructure delivery plan for these areas.

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, 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 Authority's draft PDF Area 6 Proposals. Support should be included for improved visitor facilities including the Authority's draft proposals for an improved 'Bittern information Point' (BIP) in Fishers Green 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 also included. This should sit under the section about Waltham Abbey as the Regulation 19 Local Plan no longer includes a separate section for Sewardstone.

Infrastructure and Delivery

The draft plan is accompanied by a detailed Infrastructure and Delivery plan indicating the level of infrastructure required at key trigger points during the plan period for each settlement. It indicates that sn 106 and at some point a CIL charging schedule will be agreed to fund the infrastructure.

Whilst the importance of funding of local infrastructure required to support new development is recognised it is considered that provisions should be included for commuted sums to support continued investment in the Regional Park given that additional population growth in settlements on the edge of the Park will lead to increased visits and further pressures requiring new visitor infrastructure to 'accommodate' or re-direct this activity through the Park.

The Authority would welcome feedback and further discussion on the comments made above.

Yours sincerely

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Head of Planning and Strategic Partnerships

Appendices

Plan and photographs of Mile and Langley Nursery

Pre application advice

Proposed Opportunity Area adjacent to Lee Valley White Water Centre