

Name:

ELIZABETH BURN

Representation form: Consultation on the Main Modifications to the emerging Local Plan

Part B – Your representation on the Main Modifications and/or supporting documents

If you wish to make more than one representation, please complete a separate [Part B form](#) for each representation and clearly print your name at the top of this form.

4. Which **Main Modification number and/or supporting document** does your representation relate to? (Each Main Modification within the Schedule has a reference number. This can be found in the first column i.e. MM1, MM2 and each Supporting Document has a reference number beginning with ED).

Any representation on a supporting document should clearly state (in question 6) which paragraphs of the document it relates to and, as far as possible, your comments should be linked to specific Main Modifications. You should avoid lengthy comments on the supporting documents themselves.

MM46 - Supporting text to Policy DM 2, including Paragraph 4.23 and 'Footnote 1', the provision of SANG (within the new 'Green Infrastructure Strategy').

MM47 - Supporting text to Policy DM 2, including amendments to Parts A, B, & C (remove Parts D and E) (Reference to B3 - 'Green Infrastructure Strategy')

**(Also with reference to MM24 and MM25 - in relation to Policy SP7:
The Natural Environment, Landscape Character and Green and Blue Infrastructure)**

Supporting document reference

**ED124F - (EB159F) - 'Green Infrastructure Strategy'-
Implementation (No.4) - Enhancement Projects -
Re: 'Theydon Bois Wood' (Woodland Trust site)**

5. Do you consider this **Main Modification and/or supporting document**:
(Please refer to the Guidance notes for an explanation of terms)

- | | | |
|-------------------------|------------------------------|--|
| a) Is Legally compliant | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| b) Sound | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

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

Positively prepared

☒

Effective

☒

Justified

☒

Consistent with national policy

☒

6. Please give details of why you consider the **Main Modification and/or supporting document** is not legally compliant or is unsound. 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.

**Epping Forest District Council's 'Green Infrastructure Strategy':
ED124F/EB159F – Part 4 – Re. 'Theydon Bois Wood'**

If a further Hearing Session is scheduled with respect to **Policy DM 2**, or the new '**Green Infrastructure Strategy**' (and/or **Policy SP7**), I would be happy to attend and to make a representation, as appropriate.

7. Please set out what change(s) you consider necessary to make the **Main Modification and/or supporting document** 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.

Having spoken at the Examination in Public (in May 2019) on the new 'Green and Blue Infrastructure Strategy' (at that time, referenced under Policy SP7), I was particularly interested to see the publication of a new Supplementary Planning Document, in the summer of 2020, entitled 'Green Infrastructure Strategy'.

However, after the First Draft, there was no further public consultation with respect to the 'finalised' version (issued in March 2020), and much of the detail, some of it significant, was missing on the earlier occasion when the consultation took place.

Whilst Epping Forest District Council ('EFDC') had not formulated a SANG Strategy at the time of the Examination in Public (in 2019), some of what may have been anticipated would now appear to be integrated into the Appendices of the new 'Green Infrastructure Strategy'.

However, the inclusion of the area described as 'Theydon Bois Wood' would not be appropriate for inclusion under this provision, since it is an isolated site, some distance from the settlement of Theydon Bois itself, and not likely to provide

sufficient amenity to divert recreational pressure, from either existing or new development, away from the Epping Forest Special Area of Conservation ('EFSAC').

The area is managed by the Woodland Trust, but resembles forestry land, with much of the high density tree planting being contained within compounds, mostly inaccessible and not particularly welcoming, especially for those walking alone. The presence of the M11 motorway clearly detracts from the quiet ambience one might expect in an area of open countryside and much of the topography is flat, affording only a few distant views, a number of which are obscured by the trees!

More appealing areas of open Green Belt land exist, and are accessible via public, and permissive, rights of way, closer to the village, where the rising topography of the landscape provides the visitor with attractive long-distance views across several horizons. Some element of passive surveillance from residential dwellings on the perimeter of the settlement also provides for a safer environment for female hikers and dog-walkers, a number of whom prefer the open fields to more secluded Forest land.

It is unfortunate that the late consideration of a SANG Strategy did not fully assess the potential of natural greenspace nearer to the settlement, and the '4Global Report' did not specifically look at the amenity value of those areas which were not already designated.

Residents within the village are unlikely to view the Woodland Trust area as an attractive alternative, and a more thorough appraisal would have brought forward a better provision, within easy walking distance of the settlement.

In conclusion, I am of the view that the inclusion of the Woodland Trust area would not be justified, nor in practice effective, in providing the suitable alternative natural greenspace needed to mitigate against recreational pressure on the EFSAC from new development within Theydon Bois; a shortcoming which would, therefore, undermine the soundness of Policy DM 2.

8. Have you attached any documents with this representation which specifically relate to an MM or supporting document?

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Yes

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No

Signature:

Elizabeth Burn

Date

22nd September 2021