

LEE VALLEY REGIONAL PARK AUTHORITY

REGENERATION AND PLANNING COMMITTEE

18 JANUARY 2018 AT 12:00

Agenda Item No:

7
Report No:

RP/14/18

EPPING FOREST DISTRICT COUNCIL DRAFT LOCAL PLAN REGULATION 19 CONSULTATION DOCUMENT

Presented by the Head of Planning and Strategic Partnerships.

SUMMARY

Epping Forest District Council is consulting on its pre submission draft Local Plan which sets out a planning framework to guide and manage future development within the District to the period 2033. Not all of the Authority's comments made to the earlier draft (ULV/114/16) have, in the opinion of officers, been adequately addressed and these matters form the substance of this report and the draft response letter included in Appendix A. Although the plan is broadly supportive of the Regional Park additional strategic policies are required. Suggestions are made to the draft policies on Tourism, Biodiversity and the Glasshouse industry. Further representations are made in respect of housing site allocations in Roydon and Waltham Abbey. Officer's initial draft comments are set out in the letter attached as Appendix A to this report. Given the short consultation timescale, on further review of the draft plan it may be that additional comment is required after this meeting and for that reason it is recommended that any further changes are delegated to officers.

RECOMMENDATIONS

Members Approve:

- (1) the comments as set out in Appendix A to this report as the Authority's formal response to Epping Forest District Council's Draft Local Plan; and
- (2) that the Committee allow delegation to officers for finalising the draft letter.

BACKGROUND

Epping Forest District Council's draft Local Plan sets out the proposed approach and detailed policies for the whole District for the period up to 2033. The plan is supported by a spatial development strategy, with development management policies for place shaping, Green Belt, the natural environment, landscape character and green infrastructure, topics. District wide policies focus on housing, the economy and transport, and there are specific policies for key

'Places' within the district such as Roydon, Nazeing, and Waltham Abbey. The draft Plan concludes with a section on infrastructure and delivery. The Council intend to adopt the Local Plan in autumn 2019.

- A substantial area of the Regional Park lies within Epping Forest District; 3929 acres or 39.46%; this includes a range of family orientated visitor facilities located at the River Lee Country Park and the Lee Valley Park Farms, well established sailing and angling activities at Nazeing lagoons, cycling and walking trails. Important ecological resources including parts of the Lee Valley SPA and Ramsar site provide opportunities to enjoy and learn about nature. Further visitor and educational activities are provided by the key heritage assets at Waltham Abbey, Gunpowder Park and Gunpowder Mills. The Lee Valley White Water Centre (LVWWC) lies just across the district boundary in Broxbourne. Please refer to the Plan at Appendix B to this report which shows the area of the Park within Epping Forest District. The Lee Valley Leisure Trust Limited trading as Vibrant Partnerships (Vibrant Partnerships) is a partner in the Council's One Epping Forest, tourism board.
- The Authority's adopted Park Plan (2000) includes strategic and local policies; these are still relevant to this part of the Regional Park pending their replacement by Park Development Framework (PDF) proposals for areas 6 and 7 covering land north of the M25 and the review of strategic policies currently underway. Adopted Area 5 proposals 'The Waterlands: King George Reservoir to Rammey Marsh 2013' cover the Sewardstone area of the Park within the District.
- 4 The Authority commented in detail on the Community Choices Issues and Options document in September 2012 (paper ULV/66/12), and made more detailed comments on the Regulation 18 draft in December 2016 (paper ULV/114/16).
- In January 2016 officers responded to the 'call for sites' identifying two sites currently in non-Park use which could address the District's demand for housing.

OVERVIEW OF THE DRAFT LOCAL PLAN POLICIES

- The draft plan identifies a new vision and objectives for the District which include support for the "recreational aims" of the Park. Access to the Park, and other open and natural spaces, such as Epping Forest, are to be enhanced for residents. Economic development objectives seek to encourage the growth of local businesses, support the diversification of the agricultural economy including the expansion of the glasshouse horticultural industry and expansion of tourism in the District by promoting and improving access to existing attractions such as the Regional Park, the Royal Gunpowder Mills site and countryside.
- The draft Spatial Development Strategy set out under Policy SP2 seeks to provide for approximately 11,400 new homes and 10,800 new jobs through the Local Plan. A large number of these (3,900) will be accommodated on sites around Harlow, and at other larger settlements such as Epping, Loughton, and North Weald Bassett. In relation to settlements close to the Regional Park, 858 new homes are proposed around Waltham Abbey, 122 at Nazeing and 62 at Roydon. An outstanding requirement for 32 pitches and 1 yard to meet the needs of Travellers and Travelling Showpeople across the District is also identified.

- The Council is proposing alterations to Green Belt boundaries in order to meet the demand for new development. The boundary changes are identified on the settlement specific maps and also include historic anomalies within the Green Belt, where development has already taken place. Strategic Policy SP6 offers protection for the Green Belt. A new designation of, 'District Open Land' which is proposed for sites taken out of Green Belt which featured in the Regulation 18 draft and to which the Authority objected does not affect any parts of the Regional Park in the current draft. Strategic policy SP7, sets out the Council's approach to protecting and enhancing the natural environment and landscape character and how the District's green infrastructure network will be extended and maintained. The Council's transport strategy is set out in Policy T1 Sustainable Transport Choices.
- Development Management Policies focus on a range of topics including habitat protection and improving biodiversity (DM1), the Lee Valley SPA (DM2), landscape character (DM3), and policy on how development proposals should incorporate green infrastructure in their design (DM5), including the integration and enhancement of pedestrian and cycle routes. Policy DM7 addresses the heritage assets within the District and the need for development proposals to conserve, enhance and respect the heritage environment and its assets. DM17 sets out policy requirements for protecting and enhancing watercourses and flood defence.
- 10 The key 'Places' within the District are covered by specific policies including a draft vision and accompanied by site allocation maps which also show Green Belt amendments. Those of relevance to the Regional Park include Waltham Abbey, Nazeing and Roydon. There are no significant policies for Sewardstone.
- 11 The draft plan is accompanied by a detailed Infrastructure Delivery Plan which sets out the process whereby planning obligations will be pooled and the specific requirements for strategic sites.

COMMENTS ON DRAFT LOCAL PLAN POLICIES

12 Lee Valley Regional Park Policy.

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 additional to 'recreation', 'leisure and nature conservation'.

General text included at paragraphs 2.18-2.24 'Strategic Policies of the Local Plan,' provide a helpful context for the Authority but need revision to include references to the Authority's adopted vision that the Park is a 'world class visitor destination' supported by adopted series of strategic aims. The current draft includes a Vision taken from the Park Plan 2000.

13 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 and Green Belt where protections should be maintained and 'previously developed land' in the greenbelt which if released for new development could have considerable value in supporting the districts draft employment and housing policies but without adversely affecting '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. A distinction or qualification within Green Belt policies to this effect would be in line with

government policy. A Plan of Mile and Langley Nurseries is attached at Appendix C to this report.

14 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. The policy would be in line with the essential thrust of the changes agreed by this Committee for the Authority's own glasshouse policies.

15 Visitor Economy

Visitor Economy Policy E4 remains as drafted in the Regulation 18 draft. Essentially it supports the sustainable development of the visitor economy. Specific support is given to the development of high quality visitor accommodation including that linked to outdoor sport and activity hubs within the Regional Park. Upgrading visitor centres and attractions and "development of appropriate new ones" is also supported in Policy E4. This is a helpful policy for the Park Authority in developing its visitor facilities at the River Lee Country Park and the Lee Valley Park Farms and it complements the draft PDF Area Proposals.

However, despite comments on the previous draft plan the District Council has not strengthened the policy for the LVWWC to include the 'showground' site as part of the 'opportunity area' to safeguard the expansion and development of the venue. Further detail should be added to this policy to support future development and improvements at the LVWWC. The Authority proposes to develop the LVWWC as the major family leisure destination within the south east, working with its leisure trust, Vibrant Partnerships through the diversification of the offer to include 'extreme sports'. An 'opportunity area' extending the site's existing curtilage and including the 'showground' site should form the basis of a master plan which could be developed jointly with both Broxbourne Borough and Epping Forest District Councils. Please refer to the plan at Appendix D to this report. Additional wording for Policy E4 is suggested in the comments attached at Appendix A to this report.

17 Traveller Site Development

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 addresses 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 and the original drafting included in the Regulation 18 plan should be retained.

19 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.

20 Places

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.

- The preferred approach for Nazeing proposes Green Belt amendments to the south of the village in order to accommodate new residential development in what is considered a sustainable expansion of Nazeing. This area lies just outside the boundary of the Regional Park; please refer to the Plan at Appendix E to this report. 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, (reports ULV/102/15 and ULV/110/16).
- A new site is proposed, partially located on agricultural land on the southern edge of Roydon. This sites lies in the Regional Park and the Green Belt. For these reasons the officers recommend an objection to the inclusion of the whole of the site for housing as it represents an erosion of open land in the Regional Park. A plan of residential site allocation in Roydon is included at Appendix F to this report.
- 23 Further the District Council has dismissed inclusion of two sites which the Authority submitted in response for the call for sites. These two sites comprise 1.64ha, are previously developed land and together could provide land for approximately 80 new dwellings. During the year the officers received a positive response following pre application meetings but this has not been followed through consistently in the draft policies of this plan. Representations will be made to ensure that both these sites are included in the allocation for Waltham Abbev.

INFRASTRUCTURE DELIVERY PLAN

24 The Council has prepared an Infrastructure Delivery Plan (IDP) to support implementation of the Local Plan. This covers significant details of the phasing and funding of new infrastructure including ancillary open spaces.

ENVIRONMENTAL IMPLICATIONS

25 There are no environmental implications arising directly from the recommendations in this report but the draft Local Plan for Epping Forest District once adopted will contain policies that guide and control development and the use of land within the District that could have an impact on the protection. enhancement, and development of the Regional Park.

FINANCIAL IMPLICATIONS

There are no financial implications arising directly from the recommendations in this report.

LEGAL IMPLICATIONS

- Planning applications referred to this Authority are submitted under the consultative arrangements of Section 14 (4-7) of the Lee Valley Regional Park Act 1966 (the Park Act). The Park Act requires a local planning authority to consult with the Authority on any planning application for development, whether within the designated area of the Park or not, which might affect any part of the Park.
- The Park Act enables the Authority to make representations to the local planning authority which they shall take into account when determining the planning application.
- Under Section 14 (2) of the Park Act local planning authorities are required to 29 include within their local plans proposals that the Park Authority has in its Park Plan which it has a statutory duty to have under Section 14(1). Inclusion of any such proposals does not mean that the local planning authority agrees or approves the proposals from the Park Authority plan but they become a material consideration when they are determining an application for planning.

RISK MANAGEMENT IMPLICATIONS

There are no risk management implications arising directly from the recommendations in this report.

EQUALITY IMPLICATIONS

There are no equality implications arising directly from the recommendations in this report.

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BACKGROUND REPORTS

Regulation 19 Epping Forest District Local Plan draft December 2017

The Lea Valley Glasshouse Industry - Laurence Gould 2012 Partnership Ltd

PREVIOUS COMMITTEE REPORTS

ULV ULV/66/12 Consultation by 20 Sep 2012

Epping Forest District

Council on

Community Choices Issues and Options for the Local Plan

ULV ULV/114/16 Consultation on Epping 15 Dec 2016

Forest District Council
Regulation 18 draft local

plan

APPENDICES ATTACHED

Appendix A

Appendix B

Appendix C

Appendix C

Appendix C

Appendix D

The Authority's draft response to Epping Forest District Council Plan showing the Park area within the Epping Forest District Plan showing Mile and Langley Nurseries

Plan showing the LVWWC Opportunity Area within the Epping Forest District

Appendix E Plan showing proposed Green belt amendments and residential

sites south of Nazeing

Appendix F Residential site allocation at Roydon

LIST OF ABBREVIATIONS

PDF Park Development Framework SSSI Site of Special Scientific Interest

NIA Nature Improvement Area LVWWC Lee Valley White Water Centre

DOL District Open Land

IDP Infrastructure Delivery Plan

Appendix A to Paper RP/14/18



Alison Blom-Cooper Planning Policy Team Epping Forest District Council Civic Offices High Street Epping Essex CM16 4BZ Email: swilkinson@leevalleypark.org.uk

Direct Dial: 01992 709885

16th December 2016

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 additional to 'recreation', 'leisure and nature conservation'.

General text included at paragraphs 2.18-2.24 'Strategic Policies of the Local Plan,' provide a helpful context for the Authority but need 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.

These points 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 are previously developed, have lawful use for commercial uses and lie within the village envelope of Waltham Abbey; they lie in a sustainable location for new development. 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 for site allocation for housing. This would have the effect of reducing the extent of land required from green field sites which lie 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.

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 addresses 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 and 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.

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 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.

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 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 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.

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

Yours sincerely

Stephen Wilkinson

Head of Planning and Strategic Partnerships

Appendices
Plan of Mile and Langley Nursery and map of land in Roydon









