

## Examination of Epping Forest District Local Plan (2011-2033)

### Dandara Ltd Hearing Statement for Matter 2: Context, Vision & Objectives and Sustainable Development

- 1.1 This Hearing Statement has been prepared by Dandara Ltd (ID: 19LAD0129) in response to the MIQs raised by the Inspector for issues being discussed in weeks one and two during 12<sup>th</sup> to 26<sup>th</sup> February 2019. This Hearing Statement should be read alongside Dandara Ltd's representations to the 2017 Submission Version Local Plan and supplemental representations to the 2018 Site Selection Evidence Base.
- 1.2 The Statement will only address MIQs that relate to Dandara Ltd's representations to the 2017 Submission Version Local Plan with specific focus on sustainable housing delivery and the failure to allocate sufficient land to meet objectively assessed housing need due to various deficiencies contained within the supporting site selection evidence base.

#### Issue 1, Question 4

**Should the vision support the leisure and nature conservation aims of the Lee Valley Regional Park to fully reflect its statutory purpose? Does the supporting text in paragraphs 2.18-2.24 adequately reflect the strategic aims of the Park Authority's adopted vision?**

- 1.3 Section 12(1) of the Lee Valley Regional Park Act 1966 states as follows:  
*'It shall be the duty of the Authority to develop, improve, preserve and manage or to procure or arrange for the development, improvement, preservation and management of the park as a place for the occupation of leisure, recreation, sport, games or amusements or any similar activity, for the provision of nature reserves and for the provision and enjoyment of entertainments of any kind'.*
- 1.4 The Regulation 19 Local Plan includes a 'Lee Valley Regional Park Vision' on pg. 18 which is supported by paras. 2.18 to 2.24. Objectives include the achievement of full utilisation of the Park for its statutory purposes and establishing an accessible, permeable and integrated visitor attraction to serve the region including its local communities.
- 1.5 Para. 2.21 explains that *"in July 2010, the Authority adopted the Vision, Strategic Aims and Principles. Adoption of a series of Thematic Proposals followed in January 2011 setting out development and management proposals on a broad Park-wide thematic basis"*. This therefore provides an existing policy framework which can positively inform the emerging Local Plan and how it seeks to achieve the overriding objectives of the Lee Valley Regional Park Authority (LVRPA) within the District.
- 1.6 Dandara Ltd does not consider that the objectives set out on pg. 18 of the Local Plan are followed through to achieve policy actions which demonstrably support the statutory purposes of the Park which talk very explicitly about development, improvement and utilisation which can be supported by a positive planning policy framework at Local Authority level.

1.7 As an example, the ‘strategic aims’ on pg. 6 of the January 2011 Park Development Framework Thematic Proposals (PDFTP) recognise that *“the Park needs more than just great activities, sights and experiences: it needs to be well known and recognised, easy and enjoyable to get to and move around, and accessible to people of all abilities”*. Within Epping Forest, the settlement of Roydon plays an important role in facilitating accessibility into the Park with pg. 11 of the PDFTP stating that *“the eastern side of the Park is less well served by rail. Only Roydon Station, provides a suitable entry, with two trains stopping every hour”*. The role of Roydon is particularly important given objective 2 on pg. 16 of the PDFTP:

*“We want as many people as possible to use the public transport network to get to the Park, especially those coming from places that are too far to walk or cycle. We want to improve the quality of access from the existing rail and bus services to make it easier to get from these transport networks into the Park”*.

1.8 Roydon is therefore critical to the LVRPA achieving the objectives of its PDFTP regarding modal shift and promotion of non-car methods of reaching the Park given that it contains the only train station that serves the eastern side of the Park. However, pg. 85 of the document includes a landscape proposals plan which identifies land immediately to the west of Roydon, which forms the gateway to the Park as one enters from the settlement, as a ‘landscape enhancement area’ (see Figure 1 below). The preceding page explains that the LVRPA will work with others, including landowners, to deliver landscape enhancement initiatives within such areas.

1.9 It is important to note that the ‘landscape enhancement area’ designation has been carried forward from the adopted 2000 Park Plan which, as well as designating land to the west of Roydon as a ‘landscape enhancement area’, also defined the term on pg. 29 of the Part Two Plan as *“areas of weak or unrecognisable character are to be strengthened through [inter alia] implementation of projects to enhance landscape quality and strengthen landscape character”*.

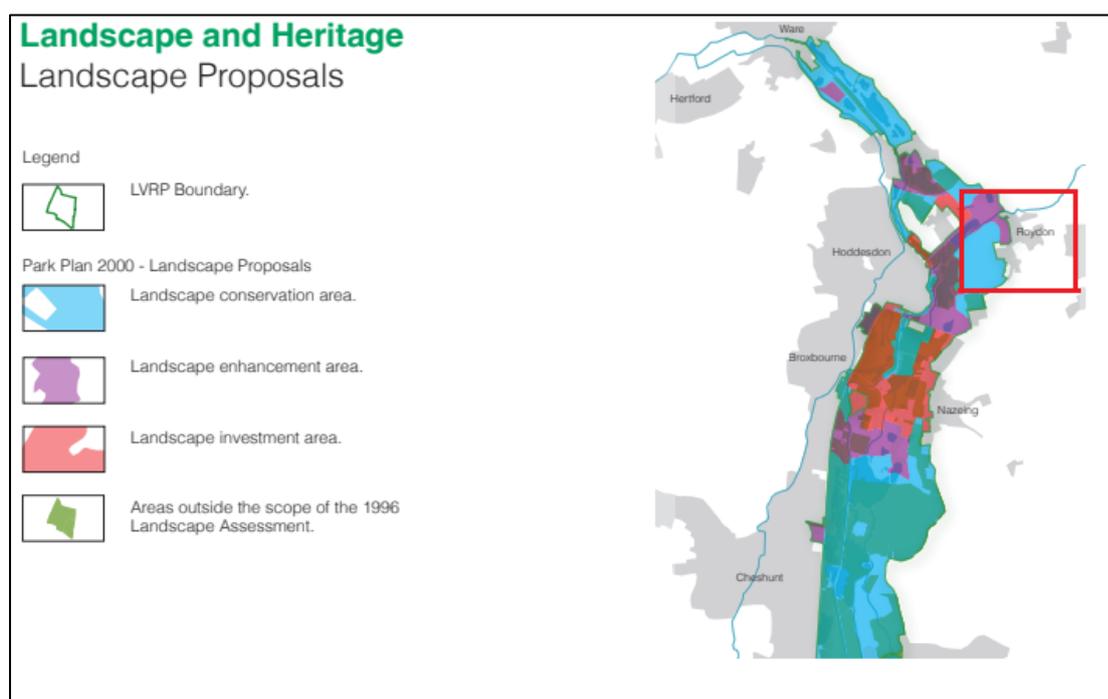
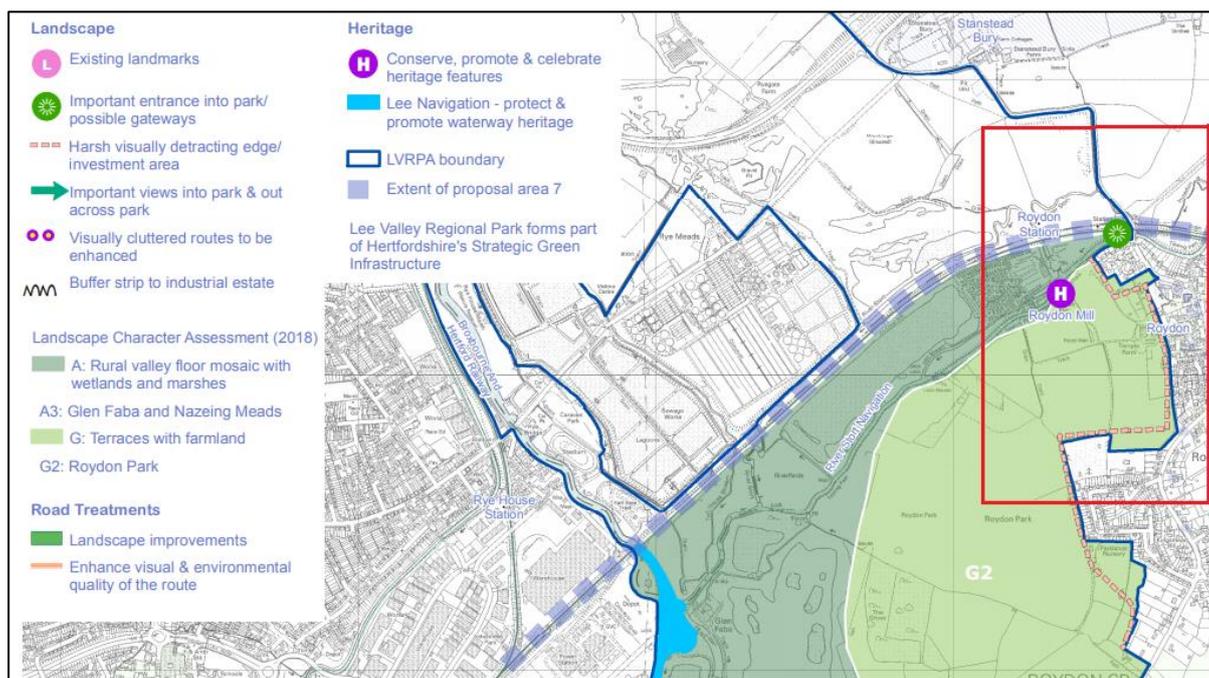


Figure 1: Landscape Enhancement Areas from PDFTP

2.0 During April to May 2018 the LVRPA consulted upon changes to the Park Development Framework including area specific proposals for Area 7 'Broxbourne to Rye House'. Following consideration of a revised draft at the Regeneration and Planning Committee held on 17<sup>th</sup> January 2019, the LVRPA intend to adopt the relevant updated parts of the PDF on the 25<sup>th</sup> April 2019. The updated equivalent to our Figure 1 of the adopted PDFTP is reproduced in Figure 2 below and identifies the Roydon Park edge as a 'harsh visually detracting edge / investment area'. This conflicts with Roydon stations identification as an 'important entrance into Park / possible gateways'.

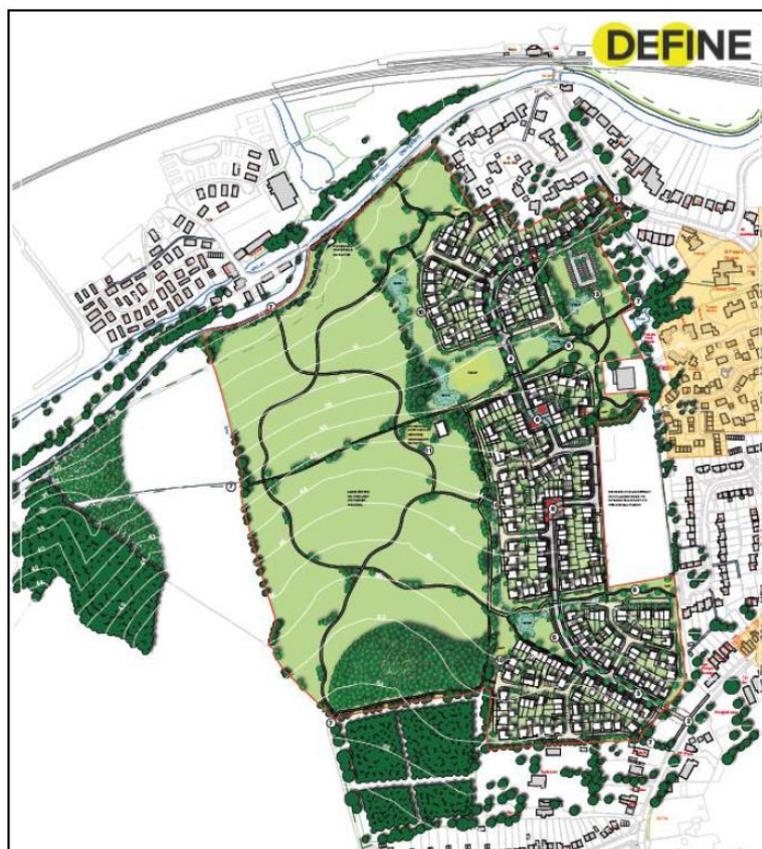


**Figure 2: Harsh, Visually Detracting Edge / Investment Area from Emerging Area 7 PDF Update**

- 2.1 The PDFTP has at its core an objective to promote sustainable forms of travel to the Park including by train. It recognises that the eastern part of the Park, which comprises a substantial and important area, relies on Roydon as the only settlement served by an existing train station. The part of the Park which immediately adjoins Roydon is however identified as a 'landscape enhancement area' and 'harsh visually detracting edge', forming a relatively poor quality and incremental gateway into the Park. There is a clear conflict here between encouraging people to access the Park by rail but via a section of the Park which is uninviting from a landscape quality perspective.
- 2.1 Whilst we appreciate the Inspector is not specifically considering 'omission sites', we think it is helpful to raise land at Temple Farm, Roydon as an example of the Regulation 19 Local Plan missing an opportunity to support and facilitate objectives set out within the Park Development Framework.
- 2.2 The LVRPA's adopted and emerging PDF identifies the eastern extent of the Park adjacent to Roydon, which equates to land being promoted by Dandara Ltd at Temple Farm, as comprising weaker landscape character which requires enhancement and improvement through intervention. Such improvement is critical to the PDF achieving its objective of

visitor modal shift to more sustainable modes of transport including rail as it is inevitable that visitors are going to be discouraged from accessing the Park via Roydon railway station if the quality of the Park environment in this location is compromised and uninviting.

- 2.3 The Inspector will be aware of Dandara Ltd's Masterplan proposals for land at Temple Farm, Roydon which is reproduced in Figure 3 below where a publicly inaccessible and visually detracting poultry farm is to be replaced with a carefully considered residential development alongside a new, circa 22 ha 'country park' which would provide a new gateway into the Park from Roydon and its mainline station. It also proposes opportunities for visitor facilities such as a café, visitor centre or recreation building that would add further attractiveness to Roydon as a 'sustainable gateway' into the Park. The opportunities associated with the development of Temple Farm are explained in detail in paras. 5.15-5.19 of our Regulation 20 representations including how enhancing the accessibility, usability, enjoyment and value of the Park via a new 'country park' fully accords with the statutory Section 12(1) remit and Park Development Framework.



**Figure 3: Temple Farm Masterplan**

- 2.4 Our Matter 1 Hearing Statement raised significant soundness concerns regarding the objectivity and robustness of those sites which, whether because they were new or incorrectly considered previously, were assessed within the 2018 Site Selection Report. Land at Temple Farm, Roydon is an example of this where, despite a Park Development Framework evidence base that clearly identifies the western edge of Roydon as comprising a harsh, visually detracting edge requiring investment and enhancement, there is a complete absence of any consideration of the benefit of development delivering a new, enhanced 22 ha public 'country park' associated with modest residential development proposals. Instead,

pg. 54 of appendix B1.5.2 of the Report simply assumes that *“it was considered that it [development] would be harmful to the setting of the Lee Valley Regional Park”*. This conclusion is reached in the absence of any consideration of Dandara Ltd’s site specific Masterplan proposals and without mention of the landscape enhancement objectives of the Park Development Framework which identify the rural edge of Roydon as lower landscape quality.

- 2.5 Dandara Ltd considers that the failure of the Regulation 19 Local Plan to consider opportunities associated with development at Temple Farm, Roydon to positively and proactively address opportunities and challenges associated with this important part of the Park is indicative of a Plan which readily repeats the aims and objectives of the LVRPA but does little to engender any meaningful improvements to the sustainability, accessibility, landscape value, usability or recreational value of the part of the Park falling within Epping Forest District.