

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

Dandara Ltd Hearing Statement for Matter 15: Places and Sites

- 1.1 This Hearing Statement has been prepared by Dandara Ltd (ID: 19LAD0129) in response to the MIQs raised by the Inspector for discussion in weeks five and six during 14th to 23rd May 2019. This Statement should be read alongside Dandara Ltd's representations to the 2017 Submission Version Local Plan, supplemental representations to the 2018 Site Selection Evidence Base and our earlier Hearing Statements.

Policy P9: Roydon

General Matters - Question 2

- 1.2 Roydon falls within the Area 7 Proposals '*The Wetland Park: Spitalbrook to Roydon*' of the Park Development Framework (April 2019). The Park Development Framework (PDF) communicates the aspirations and specific proposals for the future use and development of the Regional Park on behalf of the Lee Valley Regional Park Authority (LVRPA). This comprises the adopted 'parent' July 2010 '*Vision, Strategic Aims and Principles*' alongside a series of Thematic Proposals for each section of the Park.
- 1.3 The Area 7 Proposals, which include Roydon, are to be considered for adoption by LVRPA Members at the Authority Meeting on the 25th April 2019. This therefore represents the most up-to-date LVRPA policy basis for Roydon and its role in contributing to the future use and development of this part of the Park.
- 1.4 Section 7.A.3 of the PDF Area 7 Proposals aims to "*promote Roydon Station as a secondary gateway into the Park and ensure links through to the Park both south of the station and to the north ...*". The status of Roydon station as a secondary gateway into the Park is illustrated on the accompanying 'visitors' Thematic Proposals Map. The same map, an extract of which is reproduced below in Figure 1, indicates Temple Farm, which is being promoted for development by Dandara Ltd for new housing and a country park, as a public access point into the Park to be promoted.

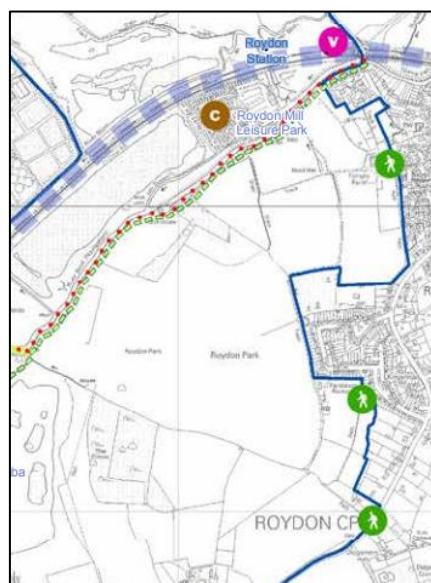


Figure 1: Visitors Thematic Proposals Map

- 1.5 The proposals to promote improvement and enhanced access into the Park from Roydon railway station as a secondary gateway builds upon a number of wider themes communicated throughout the PDF including the promotion of sustainable modes of transport to the Park and improving both access and the experience of the Park upon arrival as a positive perceptual experience for visitors.
- 1.6 Policy P9 of the Regulation 19 Local Plan fails to recognise or positively respond to the unique contribution that Roydon plays as a secondary gateway into the LVRP. Whilst there is mention of a generic objective within the 'vision for Roydon' box on pg. 154 of the Plan whereby *"links to the Lee Valley Regional Park will be improved, with impacts of recreational pressure minimised"*, this is not carried through to any of the proposed housing allocations with not a single mention of the LVRP within paras. 5.124 to 5.127.
- 1.7 Despite the recognition that the village is served by a mainline railway station, there is no mention of the importance of this sustainable transport node to facilitating and supporting access into the Park. Instead, the overriding objective of the allocations proposed for Roydon appears to be *"provision of approximately 62 homes has been informed by the aspiration for Roydon to maintain its existing character and local feel"* (para. 5.124), rather than seeking to build upon and improve both accessibility into the Park and the overall visitor experience.
- 1.8 Dandara Ltd has previously set out in detail our concerns regarding the soundness and objectivity of the site selection process regarding land at Temple Farm, Roydon (n.b. see Matter 5 Hearing Statement). Whilst we do not intend to repeat matters here, it is worthwhile reiterating deficiencies within the site selection methodology which have resulted in the Council not considering the ability to derive from new development meaningful, deliverable improvements to the accessibility and visitor perception of the LVRP from Roydon.
- 1.9 B768 of Appendix B1.5.2 of the SSR (EB805I) identifies three strategic options for Roydon comprising 'intensification' as a 'more suitable strategic option' and 'eastern expansion' and 'western expansion' as 'less suitable strategic options'. It is the western expansion of Roydon that provides the greatest opportunity to both optimise the use of Roydon railway station as a secondary gateway into the Park but also to positively address the visitor experience of approaching the Park from Roydon with the existing western settlement edge being identified as a 'harsh, visually detracting edge / investment area' on the PDF Area 7 Thematic Proposals Map reproduce in Figure 2 below.



Figure 2: PDF Landscape & Heritage Thematic Proposals Map

- 1.10 The assessment of the 'western expansion' option concludes that all land surrounding Roydon, regardless of direction, has an identical impact from a heritage and landscape perspective having regard to the 2015 'Historic Environment Characterisation Study' (EB900) and the 2010 'Settlement Edge Landscape Sensitivity Study' (EB712). It is therefore simply the proximity of the western edge of Roydon to the LVRP that results in the 'less suitable strategic option' conclusion whereby *"... as a result of its location to the west of Roydon, this strategic option would be the most harmful to the Lee Valley Regional Park relative to the other strategic options in the settlement. The strategic option would conflict with the statutorily defined purpose of the Park"* (pg. B768, SSR Appendix B1.5.2).
- 1.11 Appendix B1.5.2 of the SSR fails to assess the existing contribution of land to the west of Roydon to the setting and Section 12(1) function of the LVRP, assuming that, compared to the baseline condition, development would automatically result in harm. Land at Temple Farm, Roydon currently accommodates a poultry farm with associated outbuildings which are visually intrusive and harm both the setting and wider function of the LVRP with limited public access.
- 1.12 This is a particularly unsound shortcoming of the SSR evidence base given that the PDF recognises challenges and deficiencies associated with the quality of landscape character to the western edge of Roydon:
- The 2011 Park Development Framework Thematic Proposals (PDFTP) 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 2 below);
 - The emerging PDF area specific proposals for Area 7 'Broxbourne to Rye House' identifies the Roydon edge as a 'harsh visually detracting edge / investment area'.

- 1.13 The assumption within the SSR evidence base that any development to the west of Roydon would automatically harm the setting and function of the LVRP is partly an outcome of the Council not having regard to the most recent PDF. Following the Hearing Session for Matter 2 held on 13th February 2018, and having regard to the Matter 2 Hearing Statement prepared by the LVRPA, the Council acknowledged as per para. 19 of the LVRPA Statement that Local Plan paras. 2.14 to 2.23 had not been informed by the most up-to-date PDF. They therefore committed to updating the Plan accordingly including assessing whether other parts of the Plan require modification in light of the accepted LVRPA amendments, including the site selection process. This requires an assessment of how proposals put forward by Dandara Ltd at Temple Farm could positively address landscape, accessibility and legibility concerns regarding the harsh, visually detracting Roydon settlement edge as identified by the PDF.
- 1.14 It is not sound to simply assume that all land within the setting of the LVRP positively contributes to the Section 12(1) objectives and therefore any development would be harmful. The exact opposite is true in the case of Temple Farm where the existing agricultural use is harmful to the visual setting and physical function of the LVRP and as recognised within the PDF itself, sensitive development presents an opportunity to enhance the role of the land to better achieve the objectives of Section 12(1). No evidence has been provided to suggest that landscape assessment work undertaken by EFDC conflicts with the findings of the PDF or Dandara Ltd and we would suggest that the Council has simply linked landscape harm to the proximity of the LVRP as part of an unevidenced and lazy desk-top process.
- 1.15 The Inspector will be aware of Dandara Ltd's Masterplan proposals which are 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 PDF.



Figure 3: Illustrative Masterplan for Temple Farm

- 1.16 Despite the SSR taking into account site specific Masterplan work for numerous Regulation 19 proposed allocations, particularly the urban open spaces and car parks, there is no evidence of a similar approach being taken to consider whether development could result in improvements to the Section 12(1) objectives of the LVRP on an edge identified by the LVRPA themselves as being of compromised landscape quality.
- 1.17 If the Council had taken into account Dandara Ltd's Masterplanning for Temple Farm, they could have considered how residential development has the ability to act as a catalyst for meaningful change within the LVRP which is capable of positively and proactively addressing challenges identified within the PDF including the promotion of Roydon railway station as a secondary gateway into the Park; the western edge visually detracting from the Park; the potential for investment to create a positive relationship between the Park and the settlement; improving accessibility; and delivering a new 'Country Park' as a significant beneficial addition to the visitor and resident offer of the Park within Area 7.

- 1.18 The SSR, despite evidence available within the PDF, fundamentally fails to consider the baseline value of the land to meeting the Statutory purposes of the Park nor the ability of development to deliver significant wider benefits to the Park. Instead, the SSR takes an un evidenced and uninformed position that any development on land west of Roydon would harm the LVRP without understanding the existing value of this PDF defined 'harsh / visually detracting edge and investment area' and the significant benefits that development could bring to the recreational, leisure, ecological and visitor remit of the Park.
- 1.19 These deficiencies are most obvious within Policy P9 and its associated allocations which despite the rhetoric of improving links to the LVRP, do nothing to recognise nor positively respond to the challenges and opportunities contained within the PDF. The allocations within Policy P9 are not located to facilitate or support the role of Roydon railway station in supporting the recreational function of the LVRP and likewise do not enhance the recreation, leisure, ecological or accessibility offer of the Park. A site which has the ability to deliver a new country park and significantly improve the visitor, recreation and leisure offer of the Park adjacent to the railway station as a secondary gateway has simply not been soundly assessed within the SSR with the Council assuming that any development within the LVRP would conflict with its statutory purpose which is not a sound conclusion nor accords with the Park's own PDF.