



*Theydon Bois and District
Rural Preservation Society*

Affiliated to the Campaign to Protect Rural England
Registered Charity No. 286364
Established 1943

TO:

The Head of Planning Services
Epping Forest District Council
Civic Offices, 323 High Street
EPPING
Essex CM16 4BZ

Re. Sustainability Appraisal and Habitats Regulations Assessment Scoping Report

8th July 2010

Dear Sir,

The Theydon Bois and District Rural Preservation Society welcomes the opportunity to comment on the draft Sustainability Appraisal and Habitats Regulations Assessment Scoping Report. We will also take time to complete the online version of the questionnaire. In completing the questionnaire below we note the importance of the document as part of EFDC's LDF Core Strategy but also consider how recent changes, many beyond EFDC's control, have dated the document as originally drafted. We also seek a reappraisal of the evidence base used to categorise Theydon Bois as having a Moderate to Low sensitivity to change in the report and offer additional information that should be considered. The character of Theydon Bois is unique within the district and we believe our village has a high sensitivity to change. A more detailed assessment of Theydon Bois should result in a change to how our village is characterised than the scoping document at present contends.

**Epping Forest Sustainability Appraisal and Habitats Regulations Assessment Scoping Report Draft
Report March 2010 consultation Questionnaire**

Q1. Have all the relevant economic, environmental and social issues been listed? These are listed as thematic topics in the Scoping Report).

No.

Q2. If not what other issues do you think should be included?

Education and Agriculture are not specifically addressed as thematic topics.

Agriculture is an important and growing part of the National and Local Economy and its development will have a direct impact on a number of the other proposed thematic topics and therefore should form part of the core strategy.

Education is one of the most important issues for the community and the future economy and therefore should be treated as a separate topic.

Q3. *Has the Scoping Report identified all plans, programmes and objectives which will be relevant for the preparation of the Core Strategy?*

No.

Q4.. *If not, please name additional documents which you think should be included in the Sustainability Appraisal.*

1. **Conservative & Liberal Democrat Coalition Agreement Document** (see answer to Q6 below).
2. **Communication from the Commission Europe 2020-** A strategy for smart, sustainable and inclusive growth.
3. Communication of 21st September 2005 from the Commission to the Council and the European Parliament - **Thematic Strategy on Air Pollution.**
4. **Stansted / M11 Corridor Development Options Study.**

Q5. *Are you satisfied that all relevant sources of up-to-date information have been identified*

No. Recent developments make the draft report out of date.

Q6. *If not, please indicate what other sources of information should be included.*

We do not believe the socio-economic predictions underpinning this report fully reflect the current down turn in the economy and its effect on employment and housing growth in the south east. The report should take into consideration the most up-to-date post 2007 Government Economic predictions. Unfortunately recent further downturns in the economy, the recent change of government and with it government economic, regional and growth strategies and predictions have meant that this is at present a moving target until national policy is fully formulated and approved by parliament.

The many quite recent items of information and changes made so far that should be considered by the Scoping Report includes:

24th May 2010: Chancellor of the Exchequer announces £6.2 Billion to be saved from the Economy. These savings to include £309 Million of Local Transport Funding.

24th May 2010: The statement by BAA withdrawing their application for second runway at Stansted Airport on 24th May 2010. David Johnston, Stansted Airport's managing director, said: "We have reflected carefully on the new Government's clear intention to change its airports policy and have moved quickly to withdraw this application." – *This withdrawal will have considerable implications for the local economy, transport infrastructure and housing needs.*

Hansard – 9th June 2010 - Column 173W: Derelict Land and Green Belt (Written Answer from Robert Neill) "In the Coalition Agreement the Government stated that they will publish and present to Parliament a simple and consolidated national planning framework covering all forms of development. Announcements on the future of planning

policy will be made in due course. However, the agreement also undertakes to ensure that the protection of green belt by local planning authorities is maintained.

We have also effectively suspended the operation of regional spatial strategies and their associated housing targets, which created top-down pressure to review green belt boundaries. We will now move to formally abolish RSS". – *This national planning framework and removal of top-down pressure on the Green Belt will need to be considered for the LDF.*

10th June 2010 - Final warning by the European commission on tackling air pollution. - *Since the European commission started legal proceedings against the UK some 18 months ago the number of new practical measures to tackle air pollution has been pitiful.*

Hansard – 10th June 2010 – column 443: The Secretary of State for Communities and Local Government (Mr Eric Pickles) "Further to the coalition agreement, the Minister of State, my right hon. Friend the Member for Tunbridge Wells (Greg Clark), who has responsibilities for decentralisation and planning, gave notice to the House that we are changing planning guidance and that we have taken back gardens out of the definition of brownfield land. In addition, we have removed density requirements. The matter is now for local people to decide". - *Changes to brownfield land and housing density have implications for the report.*

Hansard – 30 Jun 2010 - column 259WH: Chris Skidmore: "It is so interesting that the hon. Lady makes that point, because under the coalition agreement we will be handing **more powers to parish councils**, certainly for local referendums, **with about 80% of parishes being able to decide where to build.** There will be areas of land in a parish that the local community wants to decide on. There are certainly village communities that want to ensure that local residents whose families have lived in an area for generations are able to carry on living in a village. That is important". – *This will mean that our Parish Council should have a greater say on how EFDC's LDF treats Theydon Bois.*

Hansard – 6th July 2010 – column 5WS: The Secretary of State for Communities and Local Government (Mr Eric Pickles) – Revokes Regional Strategies. "Regional strategies are being revoked under s79(6) of the Local Democracy Economic Development and Construction Act 2009 and will thus no longer form part of the development plan for the purposes of s38(6) of the Planning and Compulsory Purchase Act 2004". - *The revoking of the East of England Plan Regional Spatial Strategy will have a substantial impact on how Core Policy is made in the LDF. Future reform in this area will make it easier for local councils, working with their communities, to agree and amend local plans in a way that maximises the involvement of neighbourhoods.*

Hansard – 7th July 2010 – columns 98 - 99: Debate on traffic and the road network in Harlow.

Parliamentary Under Secretary of State (Regional and Local Transport) – "It is also worth pointing out that the context has changed, given that some of the justification for the northern bypass came from the significant northern expansion of Harlow that would have been needed to meet the regional spatial strategy-RSS-housing targets. With the revocation of the RSS-I am sure my hon. Friend will welcome the increased move towards devolution-there will no longer be a regional policy basis for that level of development. Obviously, we have devolution coming forward in the decentralisation and localism Bill that the

Department for Communities and Local Government will introduce and in the enterprise boards it proposes. We will see what comes from those local economic partnerships”. - *This further indicates future government thinking on the level of development in our region and the way it will be managed.*

Basically the dramatic changes in the economy and proposed infrastructure, the revoking of ‘The East of England Regional Spatial Strategy’, the increased move towards devolution and decentralisation since the ‘Draft Sustainability Appraisal Scoping Report’ was prepared will require a substantial rethink. The present Government has made it clear that local communities will have the power to agree and amend local plans in a way that maximises the involvement of their neighbourhoods and this need should be fully reflected in the Scoping Appraisal Report and future LDF.

Q7. Are you satisfied with the proposed structure of the Sustainability Appraisal?

No

Q8. If not, what changes do you suggest?

16 Central Line Settlements. Grouping Theydon Bois with Loughton and Buckhurst Hill (16.4.6) within the Sustainability Appraisal is not a fair or accurate representation of its sensitivity to change. Theydon Bois is an established and physically distinct separate village with a high sensitivity to change and as such should be considered as a separate Settlement Edge within the Functional Areas of Central Line Settlements. Greater weight should be given to the divergence of Theydon Bois in population density, SOA and employment etcetera and **it should be treated as a separate entity under section 16 Central Line Settlements.**

Q9. From your reading of the Scoping Report do you think the Sustainability Appraisal covers all relevant issues in sufficient detail?

No.

Q10. If not, what issues do you think will need more detail?

The diversity and local distinctiveness of Theydon Bois has not been sufficiently recognised within chapter 16 Central Line Settlements. We consider that Theydon Bois has particular problems and opportunities that are different from the other areas it is grouped with in the ‘settlement edge’.

Q11. Please explain what additional information will be needed.

The only commonality between Theydon Bois, Loughton and Buckhurst Hill is that they are connected but they have stations that are connected by the Central Line. If Theydon Bois was to be given the status of a separate Settlement Edge within Central Line Settlements then its uniqueness and high sensitivity could be more fully considered and appropriately assessed.

If we consider population density the average for Epping Forest is a population density of 3.57 persons per hectare. Loughton has a population of 30,340, Buckhurst Hill of 10,738 and Theydon Bois of 3,993 (*source the 2001 Census*). Buckhurst Hill has the highest population density of 27.88 followed by Loughton with 20.06. Theydon Bois is 832 hectares in area and has population density of 4.8, substantially lower and not comparable to Loughton and Buckhurst Hill.

The ward profile of Theydon Bois indicates that Theydon Bois has a higher percentage in the age group of 75 – 85+ than the district. This age group have differing housing requirements, have a greater dependence on public transport and a greater need of proximity to health services.

The appraisal cannot address pockets of deprivation whilst Theydon Bois and Loughton remain in the same 'settlement edge' as they have very divergent populations and SOA. The south of Loughton Alderton has been identified the most deprived SOA within Epping Forest. The least deprived is Theydon Bois Village.

Three of the six main centres for employment in Epping Forest are in Loughton and Buckhurst Hill. Theydon Bois has virtually no employment opportunities villagers commute elsewhere to work. There are a few people employed in agriculture on farms around the village and the historic connection with agriculture is still important to Theydon Bois as distinct from Loughton.

Theydon Bois is a distinct settlement, a forest village, surrounded entirely by farm land, new woodland (part of the Green Arc) and Epping Forest which extends into the heart of the village itself. Theydon Bois is not comprehensively connected by main arterial route, as indicated in 16.4.6, as the only connections are the weight restricted B172 and width restricted and or Protected Lanes to Loughton and Epping. The village is also poorly serviced by road, in that most of the roads that enter the village either have an environmental or 'weak bridge' weight restriction imposed on them. Apart from access to the Central Line the transport infrastructure of Loughton, Buckhurst Hill and Theydon Bois are vastly different. There are two stations serving Loughton (Loughton & Debden) and very frequent and multiple buses. The Central Line is also vastly over utilised and currently working at capacity. Theydon Bois has one station and one hourly bus. There are well documented commuter car parking problems at Theydon Bois. The development of a suggested commuter car park enabling commuters outside the district and the village to use the hub of Theydon Bois Central Line Station would be against the policy of *'adapting to the impacts of climate change'* in encouraging excessive and unnecessary use of private cars many coming from areas already well served by public transport. As the east end of the Central Line is running at capacity any increase in commuting would also be severely detrimental to local people.

Theydon Bois is not an urban area as indicated in 16.4.2 and therefore it should not be included in a grouping that contains the most urban area.

Theydon Bois is entirely located within the Metropolitan Green Belt and is of a rural character. The document concedes that it is surrounded by Theydon Garnon wood on three sides. It is surrounded by Epping Forest to the north and west with the deer sanctuary and to the north east by buffer land at Great Gregories. At the heart of Theydon Bois lies the village green also owned by the City of London. To the East and South East land is all Green Belt, green field or agricultural land or part of the Green Arc (Woodland Trust and cemetery). To the west more Green Belt, green field agricultural land. There is very little development land that is not Green Belt within the village centre. Theydon Bois would have a very high sensitivity to landscape change as the village is surrounded by woodland and agricultural land that is all within the Metropolitan Green Belt. Other areas within the functional area may have a low sensitivity to change but in our opinion Theydon Bois does not. The village is adjacent to the conservation area of Bell Common that provides an

important transition between Epping Forest and a built up area and therefore would be highly sensitive to change. The village is adjacent to the conservation area of Bell Common that provides an important transition between Epping Forest a Special Area of Conservation (SAC) and a built up area and similarly would be highly sensitive to change. It would be much more appropriate to characterise Theydon Bois as having a high sensitivity to change rather than the definition as low to moderate as in 16.4.9.

Seven LoWS are currently listed for Theydon Bois parish. Birch Hall Pastures (6.2 ha), Theydon Bois Deer Park West (9.5 ha), Theydon Bois Deer Park East including Redoak and Gaunt's Woods (14.5 ha), St Mary's Churchyard (1.0 ha), Piercing Hill Wood (5.0 ha) and Blunts Farm Wood (0.9ha) and Blunts Farm Brownfield (17.2 ha). The Society has written to Essex Ecology Services and EFDC with regard to the way Blunts Farm is listed as 'Brownfield' in the listing for Blunts Farm. The site previously had permission for a golf course, however it is not 'post industrial' and therefore is not Brownfield.

Not sufficient importance is given to the historic landscape within the Parish of Theydon Bois (16.4.7) as in 8.6.1 "There is a need protect the districts historic environment assets and their settings from inappropriate development and ensure that development respects wider historic character". There are many areas within Theydon Bois that appear on the Chapman and Andre map of 1777 that do not appear to have been taken into account.

In the chart presented to the LDF Cabinet Committee meeting of 11 March, appendix B Settlement Edge Landscape Sensitivity it states that the tables 'provide a basic outline of the overall sensitivity of each of the District's key settlement edge landscapes.' Loughton, Buckhurst Hill, Theydon Bois fringes are characterised 1-6, 1 having high sensitivity, 2-4 moderate and 5-6 low sensitivity. From further more detailed analysis figure 9.12 of the SELSS it appears that the landscape that surrounds Theydon Bois is characterised as follows; 1 - Epping Forest . 2 - Land to the East of the village centre including Theydon Bois Golf Club, City of London Buffer Land at Great Gregories, and Blunts Farm. 3 – Theydon Bois Cemetery and the Woodland Trust Site (in the Green Arc). The only land adjacent to Theydon Bois that is characterised as between 4 and 6 (top of moderate and low) are the campsite at Debden Green as a 4. There are no areas characterised as 5 or 6 anywhere near Theydon Bois, the nearest areas are the green spaces adjacent to Oakwood Hill in Loughton. There is some ambiguity in how the keying numbers have been used but it is clear that no areas of Theydon Bois have a low sensitivity to change and therefore this study in itself should indicate that Theydon Bois has been incorrectly categorised within in Scoping Report.

Q12. Any other comments.

Air Quality:

It is accepted that the M11 and M25 are major sources of air pollution in the District. To the East of Theydon Bois is the large M11/M25 junction. Expansion is already taking place on the M25 to allow for an increased traffic flow. It is likely that Theydon Bois with its close proximity to the M11 / M25 junction will have degraded levels of air quality and therefore further development in proximity in this area should be avoided as it risks contributing to exceeding or approaching air quality limits.

Monitoring should be required and proper account needs to be taken of the directives from the Commission to the Council and the European Parliament with regard to air pollution.

Sensitivity Definition Usage:

The importance of having the correct sensitivity definition can be judged by how the term 'Low to Moderate' for Theydon Bois in the Scoping Report has already been misused.

In the brief time the report has been available a company named Castra Land www.castraland.com/Castra%20Land_Theydon%20Bois%20Prospectus.pdf has been selling plots on Green Belt Land to the East of Theydon Bois in a Land Banking Scheme using quotes from the Scoping Report and the EFDC Logo and claiming:

"Not many sites around the UK have all boxes ticked as Theydon Bois does and this is arguably the best pre-development site for investors in the UK at the moment".

"To the north-east of Loughton and surrounding Theydon Bois on three sides. This area is dominated by the M11/M25 Junction, although at a distance from the motorways this area has a predominantly rural character. Overall, the area is considered to have a low to moderate sensitivity to change".

This cynical and misleading marketing has been reported to EFDC and Essex Trading Standards.

Yours faithfully,

Mr J F Watts, *for the Society*.

C.c.

Parish Cllr. Peter Gooch

Dist. Cllr. Sue Jones

Dist. Cllr. John Philip

Theydon Bois Parish Clerk, Parish Office.