

Theydon Bois Action Group

PROTECTING THE VILLAGE OF THEYDON BOIS

1 July 2010

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

The following is the response by Theydon Bois Action Group (TBAG) to the above consultation. The SA and HRA are important documents as they form part of the Core Strategy and LDF and TBAG welcome the opportunity to take part in this consultation.

The TBAG response will look to challenge and respond to the evidence base for the parish of Theydon Bois.

2.3.4 TBAG challenges the presumption that Theydon Bois should be considered under the same 'settlement edge' as the urban environments of Loughton and Buckhurst Hill purely because of its proximity to the Central Line and the M11 and M25 motorways.

2.3.5 TBAG has no objection to the majority of the 'thematic topics', however we would like to see education and agriculture included. We strongly object to the inclusion of Theydon Bois in the same 'settlement edge' as Loughton and Buckhurst Hill and request that Theydon Bois is placed in a separate and exclusive 'settlement edge' within the Central Line Settlements functional area.

2.3.11 We argue that Theydon Bois has particular problems and opportunities that are different from other areas in the 'settlement edge' in the 'functional area' of 'Central Line Settlements.'

3.2.1 The east of Theydon Bois is characterised by its proximity to the M11 / M25 junction. Although generally a more rural environment than Loughton or Buckhurst Hill the proximity to these two heavily used motorways could indicate that Theydon Bois will have lower air quality and therefore the evidence base would indicate that inclusion in the 'settlement edge' is incorrect.

3.4.1 It is accepted that the M11 and M25 are major sources of air pollution in the District.

3.4.3 TBAG request to know where the six sites identified in the District to have

exceeded NO₂ levels and ask if any of those sites are in the Parish of Theydon Bois and or in close proximity to the M11 / M25 junction.

3.4.4 An air quality analysis has been carried out at Beechfield Walk near the M25 junction 25-26. It can be assumed that if the air quality at that location is in exceedence of the annual mean NO₂ objective, then it is also most probably in exceedence at the M11 / M25 junction at the perimeter of Theydon Bois. Any air quality analysis adjacent to the M11 and or M25 should take into account any expansion of these motorways.

3.5.1 Development and expansion of either the M11 or M25 and of Stansted Airport will have a detrimental impact on the air quality of residents of Theydon Bois.

3.6.1 It is likely that Theydon Bois with its close proximity to the M11 / M25 junction will have degraded levels of air quality therefore development in proximity to this area should be avoided as it risks contribution to exceeding or approaching air quality limits.

4.2.2 Epping Forest is identified as an area of landscape, ecological and recreational importance. Policy ENV3 requires planning authorities to ensure the Regions wider biodiversity, earth heritage and natural recourses are protected and enriched through the conservation, restoration, and re-establishment of key recourses.

Figure 4.2 It is difficult to check if Theydon Green and Theydon Bois Deer Park have been included, as Corporation of London owned land, on the plan.

4.4.13 We would like to take this opportunity to highlight the seven LoWS 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).

TBAG object to the term '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. Under the definition in Planning Policy Statement 3, (PPS3) Annex B published in November 2006 the term Brownfield is clarified as "Previously-developed land is that which is or was occupied by a permanent structure including the curtilage of the developed land and any associated fixed surface infrastructure." The site has never been so used or occupied and is therefore not Brownfield.

4.4.27 There are a number of Veteran Trees in the Parish.

6.4.1 Almost three quarters of the population live in the suburban areas of Loughton Buckhurst Hill, Chigwell Epping and Waltham Abbey. The remaining quarter live in the more rural areas including the large villages of Roydon, Nazing North Weald and Theydon Bois. Epping Forest has a population density of 3.57 persons per hectare. According to the 2001 Census Loughton has a population of 30,340, Buckhurst Hill of 10,738 and Theydon Bois of 3,993. 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, considerably lower than both Loughton and Buckhurst Hill. http://mailhost.eppingforestdc.gov.uk/Library/files/planning/Local_Development_Framework/Evidence_Base/AMRs/AMR%20submitted05.pdf

http://www.eppingforestdc.gov.uk/Council_Services/planning/census/TheydonBois.asp

The population density offers further evidence that Theydon Bois should not be in the same 'settlement edge' as Loughton and Buckhurst Hill, especially as it is agreed that Loughton and Buckhurst Hill are areas of considerably higher population density.

6.4.7 *Within Epping Forest the most deprived SOA is an area within the south of Loughton Alderton and is ranked 5988th out of 32,482 nationally. The least deprived is Theydon Bois Village which is ranked 31,907th nationally.* This is another evidenced example of incompatibility with regard to the selection of the same 'settlement edge' of Loughton and Theydon Bois.

6.6.1 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.

7.4.1 How can the key objectives of reducing poverty and inequality, promoting social inclusion, promoting employment, learning, skills and innovation be specifically targeted with such diverse population density and SOA being grouped in a single 'settlement edge'?

7.5.23 There are six main centres for employment in the District, three of the sites are in Loughton and Buckhurst Hill. Another evidence based reason why Theydon Bois cannot be in the same 'settlement edge'.

8.4.5 Coopersale Lane is a Protected Lane.

8.6.1 *The particular focus of the appraisal is to protect the districts historic environment assets and their settings from inappropriate development and ensure that development respects wider historic character.* We are disappointed that Theydon Green, Burch Wood, Burch Hall, Parsonage, Blunts, Theydon Hall, Black-acre and Piggots, all listed on the 1777 Chapman and Andre map seem not to be included as historic landscapes. We are also disappointed that Theydon Bois with all its rich history and landscape character is simply listed as 'urban.'

10.2.6 As per the 1990 Environmental Protection Act we ask that EFDC secure the appropriate remediation of the potentially contaminated land located at Blunts Farm.

10.4.4 TBAG have reason to believe that sand sewerage sludge was spread at Blunts Farm.

11.2.4 PPS12 emphasises the need for evidenced based policies and plans that have regard to the sense of local distinctiveness and community derived objectives. Spatial planning provides a means of safeguarding an area's environmental assets, both for their intrinsic value and for the contribution they make to social and economic wellbeing. TBAG emphasise that in the same 'settlement edge' as more urban, densely populated towns Theydon Bois' distinctiveness and environmental assets will be ignored.

11.2.5 For the same reasons as already stated the importance of Theydon Bois' diversity and local distinctiveness will be unrecognised.

11.4.2 TBAG would contend that increased pressure for the development of golf courses only exists whilst there is a tax advantage in the methodology of landfill in their construction. Any new golf courses should be developed via 'cut and cover' and because of the onerous nature of the cost of such an operation and the current over supply of membership; any new pressure would be greatly relieved.

12.1.1 Apart from access to the Central Line the transport infrastructure of Loughton and Theydon Bois is vastly different. There are two stations within the town of Loughton and a vast supply of frequent buses. The Central Line is also vastly over utilised and currently working at capacity. Theydon Bois has one station and one hourly bus. The village is also poorly serviced by road, in that many of the roads that enter the village either have an environmental or 'weak bridge' weight restriction imposed on them.

12.3.1 In order to meet the key objective of '*reducing green house gas emissions*' and '*to move goods and people sustainably*' there should not be any increase in commuter car park provision in Theydon Bois enabling more commuters from outside the district to travel by car to a public transport hub when closer alternatives exist.

12.4.4 LTP (2) states "*This corridor is at risk from un sustainable airport expansion, excessive water extraction, fluvial flooding, high road traffic levels, and the resulting poor level of air quality especially around Epping Forest.*" TBAG would strongly resist any development in our Parish that would contribute to a reduction in air quality and would also contend that because of its proximity to the M11 / M25 junction our air quality is already compromised.

12.4.5 The location of the tube station at Theydon Bois provides an essential public transport hub. However unfortunately it also increases car usage as many of the users of the station do not live in either the village or the district coming from areas such as Harlow, Brentwood, Chelmsford and Ingatestone. The station is within walking distance of the vast majority of the village although car parking remains a constant problem. It can therefore be contended that it increases car usage with commuters travelling distances from areas that are not serviced by the underground. Without the tube line transport services in the village are inadequate. In the ward profile for Theydon Bois public transport is the third issue in the area that most need improvement. http://www.eppingforestdc.gov.uk/Library/files/planning/Local_Development_Framework/Evidence_Base/Ward_Profiles/Theydon%20Bois.pdf

12.4.6 The ward profile of Theydon Bois indicates that Theydon Bois has a higher percentage of the age group from 75 – 85+ than the district. It could be conceded that these age groups rely on a greater dependence on public transport and proximity to health services. However we only have a part time doctor's surgery and no hospital within 30 minutes of a public transport journey.

12.4.7 Any expansion of the M11 will have a detrimental effect on pollution levels to the east of the village close to the M11 / M25 junctions.

12.4.9 There are well documented commuter car parking problems at Theydon Bois. The east end of the Central Line is running at capacity and any increase would be severely detrimental to local people. Improving bus links to Theydon Bois station will just increase the congestion on an already totally overstretched transport system.

12.5.2 Increasing car park capacity at Theydon Bois tube station will not reduce car dependency.

12.6.1 As above, any increase in car parking facilities will exacerbate the use of the private car.

14&15 – No comment

16 As previously mentioned TBAG strongly object to our inclusion in the same 'settlement edge' as Loughton and Buckhurst Hill in the 'functional area' of Central Line Settlements. The inclusion in this 'settlement edge' is in draft form and we request that Theydon Bois should be included in an area with more / greater affinity and correlation within the group or in an exclusive and separate 'edge' within the area.

16.3.1 The development of a commuter car park enabling commuters outside the district and the village to use the hub of Theydon Bois Central Line Station is also against the policy of '*adapting to the impacts of climate change*' in encouraging excessive and unnecessary use of the private car.

16.4.1 *The Epping Forest Settlement Edge Landscape Sensitivity Assessment* should be available for consideration as should *Epping Forest Landscape Character Assessment*.

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

16.4.6 It is conceded that Theydon Bois is a separate village to the north west, it therefore should not be included in the same Landscape Sensitivity Area of Loughton and Buckhurst Hill.

16.4.7 There are many areas within Theydon Bois that appear on the Chapman and Andre map of 1777.

16.4.9 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 is all green belt, green field agricultural land and the Woodland Trust wood, part of the Green Arc, 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 center. Theydon Bois would have a very high sensitivity to landscape change, 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.

17.1.1 Theydon Bois should be included in separate and exclusive 'settlement edge'. The area is adjacent to Theydon Bois and there are many similar characteristics.

18 – No comment.

19.6.2 – 10 Epping Forest is a Special Area of Conservation (SAC). Theydon Bois is located within Epping Forest and should be shown as having a **high sensitivity to change** (unlike the stated 'low to moderate sensitivity to change' expressed in 16.4.9 for the area surrounding Theydon Bois), which reflects this sensitive habitat. Any increase in population density and/or traffic generation would have a damaging impact to the sensitive habitat adjacent to Theydon Bois.

20.1.1

- Theydon Bois Action Group strongly objects to the inclusion of Theydon Bois in the same 'settlement edge' as Loughton and Buckhurst Hill in the 'functional area' of Central Line Settlements.
- Agriculture and Education should be considered as Thematic Topics.
- There are little or no similarities between the urban and highly populated areas of Loughton and Buckhurst Hill and rural Theydon Bois.
- Theydon Bois is surrounded by Epping Forest and ancient woodlands many of which are clearly defined on the Chapman and Andre map of 1777. This evidence seems to have been omitted from the Scoping Report.
- Theydon Bois should be included in an exclusive 'settlement edge' and should be designated that Theydon Bois has a HIGH sensitivity to change.
- It is wholly inappropriate that Theydon Bois should be designated as having a

low to moderate sensitivity to change considering that the village is surrounded entirely by ancient forest, new woodland and agricultural green field sites that are entirely within Metropolitan Green Belt.

- The recent withdrawal of the application for a second runway at Stansted Airport and the effect this will have on employment and housing in the area should be taken into consideration, as should the current economic climate.
- If the designation of sensitivity, Theydon Bois being Low to Moderate, emanates from *The Epping Forest Settlement Edge Landscape Sensitivity Study* or the *Epping Forest Landscape Character Assessment*, these reports should be available for consideration by the public. The detailed maps contained in the *Landscape Sensitivity Study* should be available to enable us to fully respond to this Scoping Document.

TBAG would like to take this opportunity to clarify that we are sceptical that 'desk based' analysis is the way forward when dealing with such sensitive issues and a more 'bespoke' survey should have been conducted. A more detailed assessment of Theydon Bois may characterise the village as having a higher sensitivity to change than the scoping document contends.

Yours faithfully

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Secretary TBAG