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Dear Sir/Madam

**Planning for our future
Government White Paper August 2020**

Response submitted by Judith Adams Chair, on behalf of the Epping Forest Heritage Trust

Epping Forest Heritage Trust is a charity working to preserve and promote Epping Forest and advance education by promoting greater knowledge, understanding and appreciation of the Forest.

Our members (circa 1,000) largely live in the various communities in and around Epping Forest. The Trust has come from the recent merger of the Friends of Epping Forest formed in 1969 and the Epping Forest Centenary Trust formed in 1978, evidence of our long history of commitment to the Forest and to working with and for the Forest and its communities.

Epping Forest is ancient wood pasture, a former Royal Hunting Forest, and much of it is an SSSI and a Special Area of Conservation.

It is located within the London Boroughs of Redbridge, Newham and Waltham Forest and the County of Essex (Epping Forest District Council). It is well used and valued by local people and those from further afield. It is currently providing for more than 4.4 million visits a year, though this has increased now due to the Covid situation. A recent study pre pandemic identified that the background levels of air pollutants are exceeding critical levels across the Forest.

We are a stakeholder member of the Epping Forest Consultative Committee, managed by the City of London Corporation.

During the development of our response to this consultation, we consulted:

CPRE	English Nature
London Green Belt Council	RSPB
The Wildlife Trusts	TCPA
Woodland Trust	

The Trust is involved in responding to planning applications, largely within the local authority areas named above. Given the time that many planning decisions take, we are required to be very selective in those with which we get directly involved (Q2). In respect of the design of new developments in our area, they are quite variable; with some very well designed, accommodating green space and green links: others are less so (Q15).

Our responses to further questions in **Planning for the Future** are attached as Appendix A.

We acknowledge Government's aspirations to develop a simpler, faster and more predictable planning system and that there is a need to make local plans more accessible and visually engaging. However many of the reforms proposed are likely to lead to poorer outcomes for nature, a reduced opportunity for communities to influence individual proposals (about an area they know very well) and a failure to integrate nature into people's lives.

Given our proximity to and commitment to Epping Forest, we have focused many of our comments on the issues of achieving net biodiversity gain, tackling climate change and ensuring that all developments build in proposals to provide communities access to nature and quality green space with links to the wider network of green infrastructure, along with a commitment to reaching the net-zero target.

PROPOSAL 3- We welcome your aim to bring a new focus on design and sustainability. Our response to each of your commitments follow:

- a) Ensure the planning systems supports our efforts to combat climate change mitigation and adaptation and facilitate environmental benefits- *we request that you include 'avoidance' in your list of approaches to combat climate change*
- b) Facilitate ambitious improvements in energy efficiency standards for buildings – to help deliver your commitment to net-zero by 2050 - *agree*
- c) Ask for beauty – *agree*
- d) Make it easier for those who want to build beautifully through the introduction of a fast-track for beauty – *the key issue here is at what cost- beauty is by no means the main criteria for a fast track approach-*. Clear guidance that defines a “beautiful development “ will be required.
- e) Introduce a quicker, simpler framework for assessing environmental impacts and enhancement opportunities- *a key issue is at what cost. Whilst you mention the intent for protecting and enhancing England's unique ecosystems, it is not clear what that means in practice and many green spaces could be at risk, from either adjacent or close to applications.*
- f) Expect design guidance and codes - *is welcomed. Noting that they are to be prepared locally.*

g) Establish a new body to support the delivery of design codes in every part of the country - *this raises the question as to how the commitment in 'i' to be prepared locally fits with the commitment to this new body. How does this new body respond to the significant variation in communities and places? Who decides?*

h) Requiring a Chief Officer in each planning authority for design and place-making- must be a statutory requirement as like Education- *how would it be funded and is it the right brief?*

i) Lead by example by updating Homes England's strategic objectives to give greater emphasis to delivering beautiful places- *agreed that both agencies need to respond to this in the same way.*

j) Protect our historic buildings and areas while ensuring the consent framework is fit for the 21st centenary - *agreed*

PROPOSAL 4- to improve infrastructure delivery in all parts of the country and ensure developers play their part, through reform of the developer contributions – *noted*

PROPOSAL 5 - to ensure more land is available for the homes and development...

a) A new nationally-determined, binding housing requirement that local authorities would have to deliver through their Local Plans – *it would be very difficult to respond to local situations and could bring substantial devastation to our natural environment*

Our top concerns in respect of this White Paper are:

In these pandemic times, nature and green spaces have become increasingly used and valued by people, contributing to their health and wellbeing. Public surveys have also shown an increase in people's enjoyment of nature and green spaces and that they will continue to use (and value) green spaces now more than they did in the past.

a) The reforms to the planning processes are highly likely to increase nature's decline.

The data-driven and strategic approaches to zonal planning fail to integrate nature effectively in Growth Areas and Renewal Areas and offer less protection than is available under the current system.

The proposed weakening of the Environmental Impact Assessment through streamlining and the little consideration on how planning could contribute to the Local Nature Recovery Strategies, set out in the draft Environment Bill, pose threats to nature's recovery.

In addition, there is no clear guidance on how these will be integrated into this new planning system to provide the foundation of a Nature Recovery Network.

The White Paper fails to address the protection of green spaces, indeed there is likely to be loss of green belt and local wildlife designations, placing further risk to both climate change and biodiversity loss.

b) The reforms fail to integrate nature into people's lives, something that is recognized as essential for our health and wellbeing. For example, there is no suggestion of including nature, or accessible natural green space in the Renewal areas; those areas where people already live. This brings a high risk of direct loss of accessible nature-rich green space, due to infilling.

c) The reforms risk undermining the democratic process and provide less opportunity for people to influence individual development proposals. The Planning White Paper is removing some of the ways in which local people can engage in the planning system.

We want to see:

1 Wildlife recovery and people's easy access to nature must be at the heart of planning reform. Strategic planning for nature, in which the network of space needed for nature's recovery is identified, mapped and integrated into the planning system, must be applied across all areas. The Nature Recovery Network map must underpin and inform local plans and be upheld by law, in line with proposals in the draft Environment Bill.

2 Nature protection policies and standards must not be weakened, and the assessment of environmental impact must take place **before** development is permitted.

3 The ecological and climate crises must be addressed by protecting new land put into recovery. This could be established by creating a new designation Wildbelt- this would help to speed up the Nature Recovery Network (to which the Government is already committed).

4 People and local stakeholders must be able to engage with the planning system at points where it is meaningful to them and sufficient information is available to understand the impacts – on nature and on local communities. We are concerned about this apparent loss of local interests in the proposed planning process.

Consultations must ensure communities are made aware of all the issues and opportunities their community faces – including both climate and ecological challenges, alongside the local housing needs forecasts.

5 Decisions must be made on accurate nature data, requiring a programme of investment to establish high quality data.

The Government, through this White Paper, has the chance to step up as 'guardian for nature' and ensure that every community has access to green spaces rich in

nature; otherwise it will sacrifice vital legal protections and watch as nature's future is further destroyed.

Given the Prime Minister's pledge in autumn 2019 'to reverse biodiversity loss by 2030', it is the time for Nature's recovery to be part of planning changes (TWT) and to 'rewild' the planning system, for people, for the environment, addressing climate change and the ecological emergency.

Yours sincerely,

Judith Adams MIEEM

Appendix A PLANNING FOR THE FUTURE Questions

Response from Epping Forest Heritage Trust

1. What three words do you associate most with the planning system in England?
Thorough, complicated, time consuming

- 2(a). Do you get involved with planning decisions in your local area? [Yes

3. Our proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and planning proposals in the future?
Councils on line bulletins of recent applications/ Online news / and local
Newspapers

4. What are your top three priorities for planning in your local area?
Protection of green spaces
The environment, biodiversity and action on climate change
Protection of existing heritage buildings or areas

5. Do you agree that Local Plans should be simplified in line with our proposals
No – Local plans should set out positive visions for the future of areas.

6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?
No- risks losing local input opportunities into the development management policies

9(a). Do you agree that there should be automatic outline permission for areas for substantial development (*Growth areas*) with faster routes for detailed consent?

No- The White Paper states: 'Our reforms will democratise the planning process by putting a new emphasis on engagement at the plan-making stage. At the same time, we will streamline the opportunity for consultation at the planning application stage, because this adds delay to the process and allows a small minority of voices, some from the local area and often some not, to shape outcomes.'

The specific details of the proposals reduce democratic accountability and the individual rights of the citizen to participate and this must be addressed as planning reform is taken forward.

9(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?

NO- we are concerned that such a proposal focuses on speed rather than the importance and value of a truly democratic planning system.

10. Do you agree with our proposals to make decision-making faster and more certain?

No- We welcome the aspiration to involve more people in planning and to focus on better outcomes.

13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system? YES

15. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?

Tackling the climate crisis and loss of biodiversity and ensure any development does not reduce available green space.

23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights? Yes- All homes, including those delivered via permitted development rights, should contribute to delivery of much needed infrastructure.

26. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

Local plans should be made more accessible and transparent. Digital tools have a role to play; however some parts of society who are less able to access information digitally should not be excluded from processes; for example anyone with a visual or physical disability.