

**Report to the District Development
Management Committee**



**Epping Forest
District Council**

**Report Reference: DEV-013-2015/16
Date of meeting: 4 November 2015**

Subject: Planning Application A/EPF/1703/15 – Various sites at main entrances to Epping Forest – Advertisement consent for the erection of 11 no. free standing gateway signs across 9 sites and 3 no. visitor hub signs across 3 sites

Responsible Officer: Graham Courtney (01992 564228).

Democratic Services: Gary Woodhall (01992 564470).

Recommendation:

- (1) That consent is granted subject to the following conditions:
1. The development hereby permitted must be begun not later than the expiration of three years beginning with the date of this notice.
 2. The development hereby permitted will be completed strictly in accordance with the approved Location Plans and the drawings and details contained within the Epping Forest Gateways Proposal document dated July 2015.

Report:

1. In accordance within its terms of reference, this application is put direct to the District Development Management Committee for determination since it is development affecting more than one Area Plans Committee (in this case, Area Committees South and West).

Planning Issues

2. The application has been made by the Conservators of Epping Forest for new signs that are part of the 'Branching-Out Project', which is a Heritage Lottery Funded project. The aims of this project are to make the Forest "*more recognisable, welcoming and accessible*".

3. Over the past five years the Conservators of Epping Forest have successfully delivered almost the entire project by making numerous improvements to the Forest and, in partnership with ECC, have worked to reduce the speed limits on Forest roads (as part of the Forest Transport Strategy).

4. This application has been submitted alongside similar planning submissions to the London Borough of Waltham Forest, the London Borough of Redbridge and the London Borough of Newham. Whilst there does not appear to have been a decision made by Waltham Forest Council at the time of producing this report the planning applications submitted to Redbridge Council and Newham Council have both been granted advertisement consent.

Description of Site

5. The application site consists of various entrance points around Epping Forest. Within Epping Forest District these points are as follows:

Gateway Signs:

- Junction of Epping High Road and Hemnall Street, Epping (Bell Common) – **1 x medium sign**
- Point of where Upshire Road becomes Horseshoe Hill, Waltham Abbey (Sergeants Green) – **1 x small sign**
- Close to The Volunteer public house on Honey Lane, west of the junction with Woodgreen Road, Waltham Abbey (Honey Lane Plain) – **1 x large sign (formed of 2 x medium signs)**
- On the Green in Coppice Row, Theydon Bois (Theydon Green) – **1 x small sign**
- At the entrance to Loughton on Goldings Hill, north of the junction with Baldwins Hill, Loughton – **1 x large sign (formed of 2 x medium signs)**
- Junction of Avey Lane and Manor Road, High Beach, Waltham Abbey – **1 x small sign**
- Point on Mott Street southwest of the junction with Avey Lane, High Beach, Waltham Abbey – **1 x small sign**
- Junction of Earls Path, Shaftsbury, Forest Road and Smarts Lane, Loughton – **1 x small sign**
- Junction of Bury Road and Hornbeam Lane, Sewardstonebury, Waltham Abbey – **1 x small sign**

Hub Signs:

- Entrance to car park at Connaught Waters, off Rangers Road, Loughton – **1 x hub sign**
- Entrance to car park on Manor Road, High Beach, Waltham Abbey – **1 x hub sign**
- Entrance to car park on Pauls Nursery Road, High Beach, Waltham Abbey – **1 x hub sign**

6. The sites are all located within the Metropolitan Green Belt on Epping Forest owned land.

Description of Proposal

7. Consent is being sought for the erection of a total of fourteen non-illuminated signs consisting of small, medium and large gateway signs and visitor hub signs. Several of the proposed signs would replace existing signage.

8. The small gateway sign would measure a total height of 1.9m and a maximum width of 831mm.

9. The medium gateway sign would measure a total height of 2.38m and a maximum width of 1039mm.

10. The large gateway sign would measure the same as the medium sign (2.38m height and 1039mm width) however would be formed from two signs, one on either side of the road.

11. The hub signs would measure the same as the small gateway signs (1.9m height and 831mm width).

Relevant History:

12. None relevant to this application.

Policies Applied

CP1 – Achieving sustainable development objectives
CP2 – Protecting the quality of the rural and built environment
GB2A – Development in the Green Belt
GB7A – Conspicuous development
HC5 – Epping Forest
DBE13 – Advertisements
RST1 – Recreational, sporting and tourist facilities
ST4 – Road safety

13. The above policies form part of the Council's 1998 Local Plan. Following the publication of the NPPF, policies from this plan (which was adopted pre-2004) are to be afforded due weight where they are consistent with the Framework. The above policies are broadly consistent with the NPPF and therefore are afforded full weight.

Consultation Carried Out and Summary of Representations Received

14. Given the various locations of the proposed signs no residents were directly consulted, however Site Notices were displayed in the vicinity of each location between 7 and 14 August 2015.

WALTHAM ABBEY TOWN COUNCIL – No objection.

EPPING FOREST TOWN COUNCIL – No objection in principle, but feel the sign is disproportionately large at this location and would request a small gateway sign, rather than medium.

LOUGHTON TOWN COUNCIL – Object to the design of the proposed signs as they were considered totally unsuitable and a potential distraction for motorists. Whilst recognising the merits of the Walter Spradbery design, members considered the use of trees on signs within the Forest somewhat superfluous.

THEYDON BOIS PARISH COUNCIL – Object as the proposed signs are totally inappropriate and somewhat garish, and they distract from the natural beauty of the surroundings which needs no further advertisement. We also believe that metal signs will be prone to theft as has been the case as with many metal road signs in the area.

EPPING SOCIETY – Object as the material of the signs would not stand up to misuse and damage and feel that the proposed Hemnall Street sign would obstruct sight lines and result in a danger to road safety.

THEYDON BOIS ACTION GROUP – Object due to the scale, materials and design of the signs and consider that these would not respect their settings.

THEYDON BOIS AND DISTRICT RURAL PRESERVATION SOCIETY – Object as the proposed sign in Coppice Row is over large and ‘gaudy’ and excessively dominant, detracting from the openness of the village green. The sign is likely to be targeted by metal thieves and it is considered that the existing wooden signage is perfectly adequate.

LOUGHTON RESIDENTS ASSOCIATION – Object as the signs are unacceptable due to the scale, shape, material and garish colour and since the proposed materials have a tendency to crack or shatter when bent or hit.

BUCKHURST HILL RESIDENTS SOCIETY – Object to the design of the proposed signs and consider that any new signage should be redesigned in line with the existing signage. Also concerned about highway safety due to the wording of the signage.

Issues and Considerations

15. Paragraph 67 of the National Planning Policy Framework states that *“advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts”*.

16. With regards to amenity considerations, the recently published National Planning Practice Guidance (NPPG) states *“in practice, ‘amenity’ is usually understood to mean the effect on visual and aural amenity in the immediate neighbourhood of an advertisement or site for the display of advertisements, where residents or passers-by will be aware of the advertisement. So, in assessing amenity, the local planning authority would always consider the local characteristics of the neighbourhood: for example, if the locality where the advertisement is to be displayed has important scenic, historic, architectural or cultural features, the local planning authority would consider whether it is in scale and in keeping with these features”*.

17. With respect of public safety concerns, the NPPG states that *“all advertisements are intended to attract attention but proposed advertisements at points where drivers need to take more care are more likely to affect public safety. For example, at junctions, roundabouts, pedestrian crossings, on the approach to a low bridge or level crossing or other places where local conditions present traffic hazards. There are less likely to be road safety problems if the advertisement is on a site within a commercial or industrial locality, if it is a shop fascia sign, name-board, trade or business sign, or a normal poster panel, and if the advertisement is not on the skyline”*.

18. The NPPG also provides the following list of advertisements which may cause danger to road users:

- (a) *Those which obstruct or impair sight-lines at corners, bends or at a junction, or at any point of access to a highway;*
- (b) *Those which, because of their size or siting, would obstruct or confuse a road-user’s view, or reduce the clarity or effectiveness of a traffic sign or signal, or would be likely to distract road-users because of their unusual nature;*
- (c) *Those which effectively leave insufficient clearance above any part of the highway, or insufficient lateral clearance for vehicles on the carriageway;*
- (d) *Those externally or internally illuminated signs including those utilising light emitting diode technology;*

- (e) *Those which incorporate moving or apparently moving elements in their display, or successive individual advertisements which do not display the whole message;*
- (f) *Those requiring close study (such as Public Information Panels), which are situated so that people looking at them would be insufficiently protected from passing vehicles; or those advertisements sited on narrow footpaths where they may interfere with safe passage by causing pedestrians to step into the road;*
- (g) *Those which resemble traffic signs; and*
- (h) *Those which embody directional or other traffic elements and which need special scrutiny because of possible resemblance to, or confusion with, traffic signs.*

Reason for Proposed Development

19. The aim of the proposed gateway and visitor hub signs is to give visitors a sense of arrival to Epping Forest, which is an important recreational, tourist and ecological facility, and to remind drivers to be more aware of the forest environment.

20. Epping Forest is part of the City of London's Open Spaces department. In July 2013 a report was presented to the Open Spaces Committee, which outlined the need to undertake an identity project to develop a consistent look across the numerous City of London managed Open Spaces. It was decided that the main design had begun to look dated, since it is more than 25 years old, and there was a lack of uniformity across the organisation caused by different Officers interpretations of the design over time.

21. It is stated by the applicant that the management of the Forest has often been confused with other opens spaces or parks funded by local authorities and the City of London felt that the lack of a strong identity was a missed opportunity for proactively communicating its work in protecting and maintaining green spaces for the people of London and beyond.

22. In November 2013 the new visual identity for Open Spaces was approved by the Open Spaces Committee. This new identity reinforces that Epping Forest is a charitable trust that rely on charitable donations, grant aid and donor funding to maintain the Forest.

23. It is stated by the applicant that the City of London Corporation is currently making further budget reductions of some £20.84 million. Epping Forest's £4.5 million operating budget has already fallen by 12.5% to 2015, and will reduce by a further 10% to 2018; despite statutory and operational liabilities increasing. The City's private investment fund remains the main source of income but the City of London considers that promoting the Forest, and its charitable status, is vital for the Forest's future.

24. The submitted supporting statement for the proposed development provides the following justification for the principle of the proposed signage:

The gateways are part of a larger 'layered' approach to interpretation which presents a consistent visual identity to our visitors.

The gateways welcome people across the threshold into the Forest, announce your arrival in a special place and reinforce the Conservators stewardship of the Forest. Following entrance to the wider Forest, a visitor

arrives at what we refer to as a visitor 'hub'. Signs which announce the arrival at one of these hubs, for example High Beach, are a scaled down version of the gateway sign. This gives a visitor the reassurance that they have arrived at their intended location when visiting a site for the first time. These hub signs have been included in the application for information but it is the Conservators understanding that no planning consent is required.

Once at the intended destination, the next signs a visitor come across will be an orientation/interpretation panel which orientates/educates the visitor about that area. Further interpretation panels might be found when journeying around the site, again smaller and at a lower height than the first panel. Although not within the existing gateway budget, the Conservators intend to roll out the application of the new identity to all Forest furniture (benches, way mark posts, waste bins, etc.) to ensure continuity with the major signage.

Finally, all our recent publications (leaflets, posters and newsletters) have been redesigned to match the new identity along with staff uniform and vehicle livery. This layered approach to interpretation provides a repetition of the corporate identity at each step in a visitor journey.

25. The chosen image for the proposed signage is the work of Walter E Spradbery, who was a local artist that lived near and used the Forest as inspiration for his work. He undertook work on the 'Beyond the City' travel campaign commissioned by the Underground Electric Railways Company Ltd (predecessor of Transport for London) in the early 20th century. It is stated that earlier design revisions with new images and abstract designs were rejected under scrutiny that the images would date quickly and not be understood by the visiting public. However it was decided by the Open Spaces Committee that the chosen image is a good representation of the Forest for visitors and it will still look fitting in 20+ years.

Design

26. Several objections have been received from local councils and resident groups with regards to the overall design of the proposed signs. Within these representations there are comments that "*members considered the use of trees on signs within the Forest somewhat superfluous*" (Loughton Town Council) and "*the proposed signs are totally inappropriate and somewhat garish*" (Theydon Bois Parish Council), with comparisons to 'motorway signage' and comments on the colours chosen.

27. This is more an issue of taste, but the use of trees on the signs is a logical decision given the key feature of Epping Forest (being a forest) and whilst alternative colours were explored, including signs in greens, orange and plum, consent to reproduce Spradbery's work was granted by the London Transport Museum (the copyright holders) on the basis that neither the colour or image are altered or modified. Furthermore, whilst some people may consider the colour of the signs 'garish' (which is matter of personal taste) the signs are required to stand out against the backdrop of the Forest, so colours that 'blend in' would not meet the needs of the City of London.

28. The shape of the proposed signs, with the single curved edge, has been chosen to reflect the new Open Spaces identity. The existing signs, which are to be removed and replaced at several of the application sites, are significantly larger than the proposed signs. The medium signs at 2.38m tall are over half a metre shorter than the 3.2m tall existing signs. The small signs proposed are 25% smaller than the

medium signs and have a surface area of just over 1.6m² and stand marginally taller than the height of an average man. It is stated that *“the proposed new signs have been designed smaller and make better use of overall space by offering a warm visual greeting to our visitors and incorporating larger text”*.

29. Two of the proposed gateway signs would be located within conservation areas. Whilst the new signage would be less in keeping with the character and appearance of the district than the existing signs the proposed new signs nonetheless do not raise any objections from the Council’s Conservation Team since they *“feature well thought out design and are made with long lasting materials”*.

30. The design of the signs has gone through a lengthy decision process and there is clear reasoning behind the final choice. Whilst the final design may not be to everybody’s taste it is not considered that the proposed signage would be detrimental or out of keeping with the local characteristics of the areas in which they would be located and the new signage would be to a scale similar to, or smaller than, the existing signage which it replaces. Furthermore these signs are similar to the recent new signage implemented by the Lee Valley Regional Park Authority across the LVRP.

Proposed Materials

31. The proposed new signage would be constructed of vitreous enamel (VE), which was chosen since it was the only material which offered a 15 year guarantee against weathering, fading or graffiti. The signs would be a sealed unit and therefore should not suffer from internal rusting, and it is stated that these signs are able to withstand the normal wear and tear of the outdoor environment. VE has been used for numerous urban city centre applications including Transport for London’s ‘Legible London’ campaign, new London Underground signage, London Borough of Camden outdoor interpretation signs, and City of London public information signs.

32. Whilst it is considered that the existing signs are more in keeping with the rural area these are wooden signs with a significantly shorter shelf life. Furthermore there are increasing health and safety concerns regarding the existing signage due to the inevitable splintering of the wooden signs if/when struck, which can be dangerous to vehicles and pedestrians and cause detritus on the road. The use of VE signs would be more hardwearing and safer from a highways point of view.

33. Concerns have been raised that the new metal signs may be the target of ‘metal thieves’. Whilst this is not a valid planning consideration the signs are a sealed unit and as such they have no scrap value.

Highway Safety

34. To improve the environment of Epping Forest the City of London has worked with ECC to reduce the speed limit on Forest roads to a maximum of 40mph. The proposed signage is another attempt to remind drivers to be more aware of the forest environment, being alert for visitors, cattle, etc., and therefore to encourage people to drive accordingly.

35. The final design, location and fabrication method is the result of several months’ work in consultation with the Highways Team at ECC. The signs are specifically designed to catch a driver’s eye and be bold enough to communicate the intended information however are accepted as not being distracting. The design ensures that the text is at a similar height to that found on highway signs and the font

size meets with highway legibility standards. The signs are non-illuminated and are not reflective and the VE surface material has been confirmed as suitable in terms of glare caused by headlight reflection when night driving.

36. Previous design concepts for the signs included the use of materials such as oak, which whilst more suitable to the environment are considered to be an increased risk to vehicular traffic due to the potential for signs to fragment if impacted, thus potentially causing damage to other road users.

37. A detailed risk assessment survey of each proposed sign location was commissioned to ensure that there was no significant increased risk to drivers as a result of installing the new signs. This has been assessed by ECC and as a result the Highway Authority has raised no objection to the proposal.

38. A comment has been received from Buckhurst Hill Residents Society stating that they are “*unhappy with the phrase ‘thank you for driving carefully’ which suggests that having left the forest you do not need to continue driving carefully*”. In response to this the applicant has stated that:

‘Please drive carefully’ or ‘Reduce your speed’ highway signage can be seen in many towns and villages, for example at the entrance to Stewardstonebury in Epping Forest District Council. The Conservators understand that the gateway signs are not highway signs and adding instruction to drivers on the face would be inappropriate. However, the rear of the sign offers the opportunity to be grateful to those who have obeyed the new speed limit. The phrase ‘thank you for driving carefully’ is intended only to encourage adherence to the new slower limitations, and responsible driver behaviour within the Forest, not encourage irresponsible driving outside of Forest boundaries.

Other Considerations

39. The budget for the proposed signs is part of the Heritage Lottery Funded ‘Branching Out’ project. The project budget is ring-fenced and can only be used to deliver the commitments made by the City of London as part of that project. The gateways and site interpretation are the final deliverables to complete the project.

40. The gateway signs are a key component of both the ‘Branching Out’ Lottery bid and the Epping Forest Transport Strategy. The signage was designed to reinforce many of the achievements of ‘Branching Out’ and is the most significant visual expression of the changes to the Forest that have been ushered by this Project. There are no other immediate funding sources to update Forest signage and the City of London considers that the loss of this significant visual component would be detrimental to the project. To avoid wasting resources it is claimed that existing signs in good condition will be re-used elsewhere within the City of London Corporation departments.

41. This planning application has been submitted alongside applications to the London Borough of Waltham Forest, London Borough of Redbridge and London Borough of Newham. Whilst there does not appear to have been a decision made by Waltham Forest Council at the time of producing this report the planning applications submitted to Redbridge Council and Newham Council have both been granted advertisement consent.

Conclusion

42. Whilst the agreed final design of the proposed new advertisements may not be to everybody's taste, these have been the subject to much negotiation and consultation and have been agreed by the relevant Open Spaces Committee. The size, location, design and materials have been specifically designed to appropriately advertise the Forest and assist in directing/informing visitors whilst not being harmful to highway safety or the character and appearance of the area.

43. A refusal can only be made on grounds of harm to amenity and/or public safety. The coinciding applications submitted to the London Borough of Redbridge and London Borough of Newham have both been granted advertising consent and it is not considered that the signs proposed within Epping Forest District would be detrimental to the amenities of the area or public safety. The purpose of the new signage is to provide a single unified identity to Epping Forest and as such the provision of the new signs within Redbridge and Newham but not within Epping Forest would not meet the needs of the City of London. However, officers consider on their own merit for Epping Forest District area, the proposal complies with the guidance contained within the NPPF, NPPG and the relevant Local Plan policies. The application is recommended for approval.