

Epping Forest District Council Representations to the Draft Local Plan Consultation 2016 (Regulation 18)

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Method	Letter			
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Letter or Email Response:

Housing Requirements The housing growth identified for Epping Forest is shown as 11,400 dwellings over the plan period to 2033. This is to cater for the needs of the district but is not considered to robustly represent the likely need based on the growth requirements of a council on the outer borders of London. The growth forecasts and objectively assessed need are likely to lead to an increased requirement for sustainable development within the district and greater reliance for this to be met from the larger towns and settlements. Waltham Abbey is shown with a housing growth target of some 800 dwellings (an increase of 4%) as one of only 4no. towns within the district, well located to the London Orbital M25, it is considered that a higher growth target could be both deliverable and achievable. Earlier call for sites 2008/2013 At this time the land ownership was included in a broader land parcel of some 38 hectares (ref SR-0065) and noted an indicative capacity of 685 dwellings, along with an element of commercial. This duly informed the SLAA process and the larger site identified as WAL-A/SR0065 was included in the councils 2012 main report. Issues and options consultation July 2012 d It is evident from the range of responses that the Waltham Abbey resident's association was not supportive of any of the areas identified for housing growth. Their main objection being the development on the Green Belt. As regards to the WAL-A the responses note, only use the area past Leverton school. WAL-A scored slightly higher than all other 6 sites, objections to WAL-A focused on: • Noise from motorway traffic, which can be mitigated by design. • Co2 emissions - buffer band to respond to noise constraint would offer improvements. • Topography of area - The sites slightly sloping nature is not seen as a significant constraint to development. • Significant number of veteran trees - The trees protected by TPO would be subject to a BS tree survey and additional tree planting would offer enhanced biodiversity. The element of the site, which these representations are made, is all private, with no public access be they informal or formal. At this time the sites noted to the North being WAL-F were heavily objected to, based on a high impact on the green belt, view of the surrounding countryside, loss of high grade agricultural land and no opportunity to create a defensible boundary at the northern boundary of the town. No justification has been provided for the loss of land identified for the glass house industry. Green belt review A set of criteria for the assessment of green belt boundaries was agreed following the earlier consultation responses, which placed preservation of existing green belt as the highest priority. It was also agreed to protect higher grade agricultural land and undertake a comparison of housing sites to assess their deliverability and contribution to overall need. The green belt review published earlier in 2016, considered all the growth areas for Waltham Abbey and their impact on the purposes of including the land within the green belt Purpose 1- unrestricted sprawl (See plan) WAL-A is shown as affording a relatively weak contribution. WALF which is to the North of the town and WAL-F is shown as affording no contribution which given earlier comments from the issues and option responses. As WAL-F clearly provides for urban sprawl with no ability to 'hold the line' and provide a genuinely defensible boundary now and past

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2033. Purpose 2 - prevent neighbouring towns from merging WAL-A is identified like WAL-F, as affording a weak contribution. Purpose 3 - Safeguarding the countryside from overdevelopment WALA scores better than the land to the North ie WAL-F and given the M25 boundary is both defensible and logical. Taken overall, the potential level of harm to the green belt, excluding purpose 3 is noted as low for WAL-A yet very low to WAL-F. The exclusion of purpose 3, which is a very important component to including land within the green belt along with the infill type nature of WAL-A and associated defensible boundary, would appear to strongly contradict this assessment. Deliverability The location plan identifies the element of the identified site which is both deliverable and achievable. Correspondence with the land owner to the east (Redacted) indicates that they will be making representations upon their land ownership for residential purposes. Our site area of 5.2 hectares (13 acres) given known constraints, TPO's buffers, is considered to provide a nett area of some 4 hectares suitable for 100 new homes including an element of affordable housing and open space to provide a setting for the retained Honeylands complex of existing buildings. It is known that the EFDC do not intend to provide the land to the west/south for development and it is to be retained largely as existing playing field and informal dog walking, recreation and wooded area. As such the remaining land ownership is our landholding and what of Redacted, which are developable in isolation and are not considered to be linked, but can be jointly developable. It is noted within the councils latest site deliverability 2016 that WAL-A (whole site) has not been further assessed as it is not proposed for allocation. This is based on the objectively assessed requirements for Waltham Abbey (800 dwellings) having been met from other more suitable sites. Before considering further the sites suitability reference to the latest sites deliverability 2016 notes the existing uses Redacted as being a negative. The part brown field nature of an element of the central portion of the overall site, should be seen as at worst neutral, when this anomaly is corrected and we find cumulative impacts are assessed precisely as the sites to the north the deliverability to a score of 9, which is higher than other sites seen as more deliverable within the draft local plan. A revised table highlighting these scores is included on the following page. (See original document for table) Latest Site Suitability Assessment 2016 Reviewing the criteria contained within the SA and responses quoted, it should be noted that given the reduced scale for WAL-A, any impact on Epping Forest would be no worse than other identified sites. The impact on veteran trees and TPO's is noted as very, yet all trees would be subject to a BS tree survey and retained within any proposal. As such the double negative quoted would reduce it its impact. The criteria related to BAP priority species or habitats when reconsidered against the smaller land parcel within our control would also reduce. Hedgerows surrounding the site can all be retained and enhanced, whilst the land within EFDC ownership which contains grassland and woodland is to be retained. The land within the central portion of WAL-A is generally mown fields, or horse grazing land surrounding the Honeylands estate and outbuildings. Impact of air quality as noted can be mitigated, which is seen to provide for a neutral constraint. The site overall is noted within 400m to 1000m to the nearest bus stop. This is incorrect as a bus stop exists on Honey Lane within 100m, which should be shown as very good. Whilst access to strategic road network is shown as N/A, which given the opportunity to keep a significant amount of traffic from needing to pass through the already congested town centre is considered to represent an improved review. Topography is noted as a constraint, but this is considered inaccurate and as noted mitigation would neutralise this even if it were considered a constraint within any detailed design process. Impact on tree preservation order as outlined previously, any development would be subject to a BS tree survey and the trees would both inform and enhance any resultant development layout. As such this is not seen as a negative at this review stage Taken collectively, the impact would reduce to a negative 2/3 figure at worst case which is considered to better reflect development that is planned in a way which benefits the district as well as provide for future needs. A revised table highlighting these scores is included below. (See original document for table) Amenities To allow a detailed review of the sustainability of the site and a range of amenities we have assessed the site alongside the development proposed to the North of Parklands. When considered against the full range of facilities available within the locality of each identified site development to the south of Honey Lane shows an improvement to sites at WAL-F. Given this sites removal from the review process at stage 4 of the procedure is not based on other more preferred locations for development having been assessed. A breakdown of this review is shown below. (See original document for table) Summary The part of the site ...Redacted... WALF/SR0065 is considered to provide a preferred strategic growth for housing based on the following: • Proximity to tube stations • Minimising harm to the green belt • Fully defensible boundary, both now and in the future • Sustainable location • Infill to the south of Honey Lane • Logical extension to the settlement • Avoids uncontrolled urban sprawl • Balanced growth • No loss of high grade agricultural land • Connections to M25 • Reduced traffic impact • Meets the housing needs of Waltham Abbey, in a wholly sustainable way

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