

Epping Forest DC

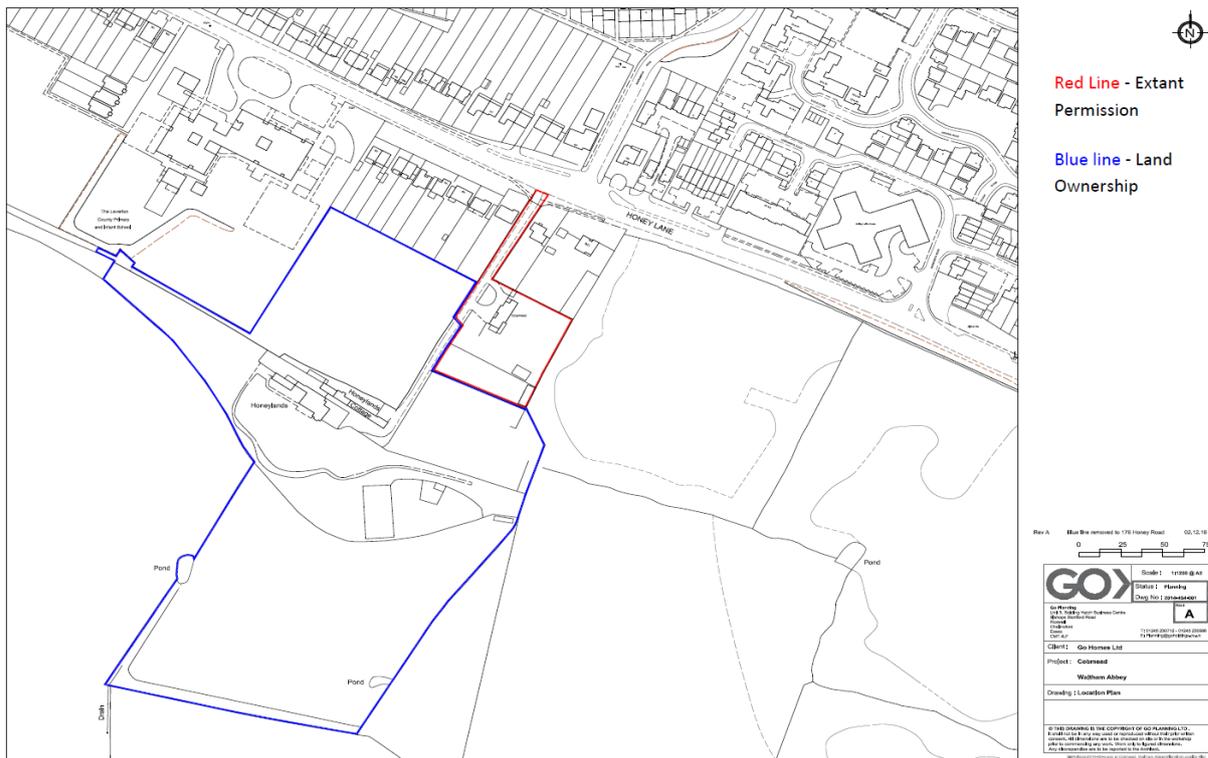
Local Plan Submission Version (regulation 19)

Site: Land to south of Honey Lane, Waltham abbey.

(Part of former sites ref no. WALA, SR0065)

Introduction

Go Homes Ltd control an area of land identified by the plan below. The site is approximately 5.2 hectares and contains existing dwellings being Cobmead and Honeylands.



Planning permission has been granted to develop 8no dwellings following the demolition of Cobmead. This would indicate the sites suitability in terms of location and sustainability.

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 WALA/SR0065 was included in the councils 2012 main report.

Issues and options consultation July 2012

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 Green Belt.

As regards to the WALA the responses note, only use the area past Levenage school. WALA scored slightly higher than all other 6 sites, objections to WALA focused on:

- Noise from motorway traffic, which can be mitigated by design.
- Co2 emissions - buffer land planning 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 5837 tree survey and additional tree planning would offer enhanced biodiversity.

The element of the site which these representations are made is all private with no public access be they formal or informal.

At this time the sites noted to the North being WALF 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

WALA is shown as affording a relatively weak contribution. WALF which is to the North of the town is shown as affording no contribution which given earlier comments from the issues and option responses appears incorrect, as WALF clearly provides for urban sprawl with no ability to 'hold the line' and provide a genuinely defensible boundary now and past 2033.

Purpose 2 - prevent neighbouring towns from merging

WALA is identified like WALF as affording a weak contribution.

Purpose 3 – Safeguarding the countryside from overdevelopment

WALA scores better than the land to the North i.e. WALF 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 WALA yet very low to WALF. 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 WALA 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 within the ownership of Scottish Widows indicates that they will be making representations upon their land ownership for predominantly 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 approximately 4 hectares 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 promote 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 that of Scottish Widows 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 WALA (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 (housing on our land) 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 increases to a score of 9 which is higher than other sites seen as more deliverable within the draft local plan.

Latest Site deliverability September 2016

Criteria	SR-0104 4.34 ha	SR-0099 16.66 ha	SR-0065 36.51 ha
Owenship	+	Site is in single ownership	+
Existing uses	+	No existing uses	+
On-site restrictions	+	Not subject to any known restrictions	0
Site availability	+	expected availability between 2016-2020	+
Site marketability	0	Marketed for development/enquires recieved	0
Site Viability	+	no viability issues	+
On-site and physical infrastructure constraints	0	Contraints have been indentified but have mitigating design solutions	+
Primary schools (planning area)	0	Located in a school planning area	0
Primary schools	-	Located more than 1km from primary school	-
Secondary schools (planning area)	0	Located in a school planning area	0
Secondary schools	+	Site is located within 1km of secondary school	-
Access to open space	-	Site more than 600m from public space	+
Health	-	Located more than 1km of health facility	-
Impact on mineral deposits	+	not a mineral safeguard area	+
Cumulative loss of open space in settlement	0	no current identified deficiencies	0
Cumulative impact on primary school (planning area)	0	Proposed allocations in settlement would lead to shortage of primary school places, potential for school to expand	0
Cumulative impact on secondary schools (planning area)	0	-	0
Cumulative impact on the green infrastructure	+	Oppertunities to enhance green infrastructure	+
Cumulative impact on on sewage treatment work capacity	+	Settlement served by sewage treatment works	+
Cumulative impact on central line capacity	+	No forecasted impact on central line stations	+

Part brownfield, why a negative?

Why has this not been assessed?

Should be positives

This could be increased to 9

Key
Neutral
Good
Bad
query
Land owners considered view

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 WALA 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 bad, yet all trees would be subject to a BS 5837 tree survey and retained within any proposal. As such the double negative quoted would reduce and any impact reduce accordingly.

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 WALA 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 was considered a constraint within any detailed design process.

Impact on tree preservation order as outlined previously, any development would be subject to a BS 5837 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.

Latest Site Suitability assessment september 2016

Criteria	SR-0104 4.34 ha	SR-0099 16.66 ha	SR-0065 36.51 ha
Impact on internationally protected sites	-	-	-
Impact on nationally protected sites	-	-	-
Impact on ancient woodland	0	0	0
Impact on ancient/veteran trees outside of woodland	0	0	0
Impact on Epping forest buffer land	0	0	0
Impact on BAP priority species or habitats	0	0	0
Impact on local wildlife sites	0	0	0
Flood Risks	0	0	0
Impact on heritage assets	+	+	+
Impact on archaeology	-	-	-
Impact of air quality	0	0	0
Level of harm to green belt	-	-	-
Distance to nearest rail/tube station	+	+	0
Distance to nearest bus stop	+	+	0
Distance to employment locations	+	+	0
Distance to local amenities	0	0	0
Distance to nearest primary/infant school	0	0	0
Distance to nearest secondary school	0	0	0
Distance to nearest GP surgery	0	0	0
Access to strategic road network	-	-	-
Brownfield and Greenfield land	-	-	-
Impact on agricultural land	-	-	-
Capacity to improve access to open space	0	0	0
Landscape sensitivity	-	-	-
Settlement character sensitivity	0	0	0
Topography constraints	0	0	0
Distance to gas and oil pipelines	0	0	0
Distance to power lines	0	0	0
Impact on tree preservation order	0	0	0
Access to site	-	+	+
Contamination constraints	0	-	-
Traffic Impact	-5	-5	-7

Key

- Neutral
- Good
- Bad
- Very Bad
- Very Good
- Land owners considered review

Scale Reduced

Trees would be subject to BS 5837
No known survey of BAP species related to land

This could be mitigated through design

The site is within 100m of bus stop on Honey Lane (Margherita Road bus stop)

Access to M25 improves this

No known constraints and could be mitigated even if it was a constraint

All development would be subject to BS 5837 tree survey

Could be reduced between -2/-3, at worst case scenario.

SP 6 Green Belt and District Open Land

The former designation of the site as District Open Space is no longer suggested no doubt due to the fact that it serves no existing function as open space, recreation and or leisure and has absolutely no public access or other benefit.

With sites WAL. E5 and WAL. E8 both being promoted as employment site allocations to the south of the M25 see map 5.6 requiring an adjustment to the Green Belt Boundary the land above the M25 is now effectively cut off from the wider Green Belt and does not contribute to the reasons for including it within the MGB designation.

The submission Local Plan at para 2.144 states “it would not make sense to create **holes** in the Green Belt” yet this would appear to be exactly the situation generated for WALA.

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 WALF.

The allocation of land to the North of Waltham Abbey as a strategic masterplan option delivering up to 610 homes does not create sustainable patterns of growth and has significant infrastructure demands which given the front-loaded nature will not allow contribution to the councils 5 year housing supply. Whereby the reduced infrastructure demands of WALA would allow early development potential.

Waltham Abbey North Masterplan

M. Development proposals in relation to sites WAL.R1, WAL.R2, WAL.R3, WAL.T1 and WAL.E7 must comply with a Strategic Masterplan that has been formally endorsed by the Council.

N. In addition to the requirements set out above the Strategic Masterplan should make provision for:

- (i) a minimum of 610 homes;
- (ii) effective integration with the Town Centre, supporting regeneration;
- (iii) up to 5 pitches for Traveller Accommodation;
- (iv) a new local centre and community facility;
- (v) Expansion of a Secondary School in the local area;
- (vi) new road links between Crooked Mile and Galley Hill and an internal road layout to support a bus corridor;**
- (vii) the potential need to upgrade/widen the existing Galley Hill Road and Crooked Mile, in order to ensure a safe access point and sufficient capacity for the development they serve;**

(viii) car clubs/car sharing or pooling arrangements, visitor parking and blue badge holders;

(ix) the strengthening and/or creation of new Green Belt boundaries to the north and east of the site;

(x) the integration, retention and improvements to the existing watercourses and public rights of way;

(xi) new pedestrian and cycle links through the site to the Lee Valley Regional Park, the existing allotments to the north, and towards Waltham Abbey District Centre;

(xii) adequate levels of public open space; and

(xiii) ensure that vulnerability to Surface Water flooding as well as the potential consequences for surrounding sites is suitably mitigated through appropriate surface water drainage.

O. The Masterplan and subsequent applications should be considered and informed by the Quality Review Panel.

P. In accordance with Part F the Masterplan should explore and support the possible relocation and expansion of the King Harold Secondary School to an appropriate site within this Masterplan Area.

These include significant constraints to development based on the existing highway network and its ability to accommodate both a safe access and sufficient capacity for the for the development proposed. This would seriously question the ability of the land to the North of Waltham Abbey to deliver the 610 homes suggested.

The impact on the Green Belt requires new buffers to the North, East for the North Master Plan area evidently acknowledging its impact on the Green Belt surroundings and that there is no existing well defined and defensible boundary.

This would not be the case for WALA which has a well defined and evidently defensible boundary with for the most part the M25.

Given this the 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.

Amenity	SR-0065 Honey Lane Plot (miles)	SR-0099 Parklands plot (miles)	SR-0104 Parklands Plot (Miles)	SR-0065 Honey Lane Plot (Miles Total)	SR-0099 Parklands plot (Miles Total)	SR-0104 Parklands plot (Miles Total)
Leverton infant school Nursery + junior school	0.05	1.5	1.4			
Hillhouse primary school + Treehouse nursery	1.5	0.8	0.7			
King Harold Academy	1.1	0.6	0.4			
Roding Valley high school (Loughton)	5.6	5.8	5.5	8.25	8.7	8
M25 access (J25)	0.4	2	1.9			
Theydon Bois tube station (Tube Access)	4.2	4.9	4.8			
Epping station (Tube Access)	5.4	5.5	5.4			
Closest Bus stop	0.1	0.1	0.1	10.1	12.5	12.2
Waltham Abbey swimming pool	0.9	1.6	1.3			
Waltham Abbey football club	1.4	1.1	1.1			
Marriot Hotel Gym	0.8	2	1.8			
Larsens recreational ground	0.9	1.1	0.9	4	5.8	5.1
Tesco superstore	1.1	0.8	0.9			
BP petrol station	1	0.7	0.8			
Waltham Abbey Princess fields post office	1.9	1.2	1			
Town centre (Restaurants + other stores)	1.2	0.8	0.9	5.2	3.5	3.6
Lloyds pharmacy	1.2	0.8	0.9			
Keyhealth medical centre	1.1	0.9	0.9			
Maynard court GP practice	0.4	1.8	1.7			
Dental Practice	1.1	0.9	0.9	3.8	4.4	4.4
Waltham Abbey community centre	1.2	0.5	0.6			
Waltham Abbey church	1.2	1	1.1			
Waltham Abbey town hall	0.4	0.9	1	2.8	2.4	2.7
TOTAL	34.15	37.3	36			

Honey Lane is shown to be in a more sustainable location by the % quoted compared to the other sites

	0	8.45	5.14
--	---	------	------

Summary

The part of the site within our control for WALF/SR0065 is considered to provide a preferred strategic growth option for housing based on the following:

- Proximity to tube station
- 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
- Support to town centre
- Meets the housing needs of Waltham Abbey in a wholly sustainable way

Conclusion

That on balance the site should be considered as appropriate for housing growth and taken forward to the new local plan.

The reliance on delivering 740 new homes to the North of the Small District of Waltham Abbey across sites WAL. R1, R2, R3 being almost 90% of the towns identified growth demands is not consistent with the local needs and pattern of sustainable growth.