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26th January 2018

Dear Sir/ Madam,

**The Local Plan (Submission Version 2017) - Consultation
Land to the South of Honey Lane, Waltham Abbey**

We write on behalf of our client (Aberdeen Asset Management) in response to the Epping Forest District Local Plan (Submission Version 2017) Consultation.

We hereby enclose a completed copy of the 'Representation Form (Part A and B), providing details of a potential development site located on the south eastern edge of Waltham Abbey. We believe the site provides an excellent opportunity to assist with the much needed delivery of homes in the District, achieving wider community benefits and in a preferable location to the current proposed sites in the Submission Version of the Local Plan (2017). A plan is attached to the representation form identifying the extent of the proposed site.

The proposed development site is circa 13 hectares and is located to the south of Honey Lane. The site forms the eastern part of site allocation SR-0065 in the Council's Strategic Land Availability Assessment (SLAA) from May 2012. It should be noted that whilst we seek to promote our site in isolation, we have been in consultation with adjoining landowners and this letter should be read in conjunction with other submissions.

In summary, the site represents a significant potential opportunity for residential development due to the following reasons:

1. Development of the site would represent a **natural 'rounding-off'** of the settlement;
2. The site benefits from a number of potential **access** points;
3. There are **no ecological designations** affecting the land;
4. The site is located in **close proximity to amenities**;

- 6. The site is **not within a Flood Zone**;
- 8. It has a flat topography and **easily developable**;
- 9. Development would **not impact on historic assets**;
- 10. The land is **not subject to any archaeological designations**; and
- 11. The attributes of the site are **better than alternative locations** being promoted. This is detailed below.

Housing Need

There is an acknowledged high level of housing need in the District and the wider sub-region. This in part is a result of the location of the district on the edge of Greater London and within the commuter belt, the increased house prices within the more central London areas, and the context of an expanding population.

The Council has identified a need to accommodate 11,400 new homes over the Local Plan period (2011-2033) as identified in draft policy SP2 (Spatial Development Strategy) and in Waltham Abbey itself (draft Policy P3), the recognised need is for 858 homes which is an increase of 58 homes when compared with the Draft Local Plan in 2016. It is understood the Submission Version of the Local Plan has identified potential sites to meet the housing need in Waltham Abbey over the plan period, including two sizeable parcels of Green Belt land to the north of the Town. However, it is our view that the Land to the South of Honey Lane is more preferable for housing development.

Site Suitability

We believe there are a number of compelling planning opportunities to support the promotion of the Land to the South of Honey Lane site for housing development. We expand on our reasoning below:

Green Belt

The proposed development site is currently identified as falling within the Green Belt, however the Council’s 2016 Green Belt Assessment: Stage 2 (site reference 060.1) recognises the relatively poor performance of the land against the Green Belt Assessment Criteria, as shown in Table 1 below.

Table 1: Extract from Epping Forest District Green Belt Assessment: Stage 2 (August 2016) - 060.1

Green Belt Assessment Criteria	Contribution
Unrestricted sprawl of large built up areas	Relatively Weak

Prevent neighbouring towns from merging	Weak
Assist in safeguarding the countryside from encroachment	Moderate
Preserve the setting and special character of historic towns	Relatively Weak

Community Facilities

The proposed development site is of a scale where it could deliver a number of benefits for Waltham Abbey and the local community. Development of this site could provide an opportunity to deliver new community facilities and infrastructure, open space and recreation/sports facilities alongside residential dwellings. Furthermore, three sites currently allocated for residential development within the Submission Version of the Local Plan are existing community facilities (WAL.R5, WAL.R6 and WAL.R4). Given the scale of our proposed site and adjacent available land, development of this site would alleviate the pressure to develop sites currently in community use.

Sustainable Location

The site's northern boundary abuts Waltham Abbey and it is bound by the A121 and M25. The site's location on the edge of the existing settlement would provide a sustainable location for further residential development. It is well placed to access existing services and facilities within the area, allowing future residents of the site the opportunity to use the existing local services and facilities within the town centre and utilise public transport nodes.

Flood Risk

According to the Environment Agency's Flood Map, the site is understood to fall within Flood Zone 1 (low risk). The site is therefore considered sequentially preferable for residential development.

Public Access/ Open Space

There is currently no public access across the site. A comprehensive redevelopment proposal would provide the opportunity to open up the site to the public, improving the quality of open space.

Biodiversity

The land is low quality and currently let for grazing. It is understood that there are protected trees on or adjacent to the site. Sensitive development of this site could preserve the existing trees and provide further biodiversity benefits, for example through providing a vegetation buffer between the site and the M25.

Site Selection Report

It is understood that the Council has been through a thorough site selection process in order to identify suitable sites for residential development as identified in the Site Selection Report (Site Selection Methodology) 2016. It is our view, however, that our site would be more appropriate for residential development in Waltham Abbey compared to the existing allocated sites.

The three largest site allocations WAL.R1, WAL.R2 and WAL.R3 (The Waltham Abbey North Masterplan Area) are located in Green Belt to the north of Waltham Abbey. As there is no defensible boundary here, we believe the development of these sites would result in encroachment onto further Green Belt and open land. The land at Honey Lane is bound by the M25 and therefore development in this location would not pose the same risk.

Within the Waltham Abbey Extract of the Site Selection Report (2016), it identifies the need for upgrade to the existing access at the WAL.R3 site (referred to as SR-104 in the report), should residential development occur. Such an upgrade would be costly and potentially disruptive to the existing highways network. The land at Honey Lane would not require access improvements due to its accessible location and the existing infrastructure. Furthermore, it is our view that further development to the north of Waltham Abbey could have significant adverse effects on congestion in the Town Centre and along Parklands. The proposed development site offers alternative routes into and out of Waltham Abbey. This would alleviate potential pressures on the highway network.

Alternative Development Options

Whilst development of the land at Honey Lane for housing would provide an excellent opportunity to assist with the much needed delivery of homes in the District, we also promote consideration of the site for non-residential development. The proximity of the M25 and Waltham Abbey makes the site an attractive and feasible location for a range of business types. We believe that, subject to community and market requirements, promotion of the land at Honey Lane for a mix of residential, commercial and community uses should also be considered.

Conclusions

We are of the view that the Submission Version Local Plan consultation period represents an opportunity to remove the site from the Green Belt and for inclusion within Waltham Abbey's curtilage, enabling it to come forward for development. We welcome the positive conclusions set out in the SLAA, acknowledging the Honey Lane site's appropriateness for development and would like to further reiterate the following planning opportunities presented by the site:

- It is acknowledged there is a high level of housing need in the District and the Council are looking to provide 858 homes in Waltham Abbey over the period 2011-2033;
- The Epping Forest District Green Belt Assessment (LUC, 2016) recognises the site's relatively poor performance against the Green Belt Assessment Criteria;
- The site is located on the edge of Waltham Abbey and therefore development would accord with sustainable development principles;
- The scale of the site is such that there is scope to incorporate much needed community facilities into development plans;
- The site is well connected to both the Town Centre and the M25 and as a consequence, housing development in this location would not cause further pressure on the local transport network. Which would likely be the case with the sites to the north of the Waltham Abbey;
- Subject to community and market need, the scale of the site and its location would also make it attractive and feasible for commercial development.

We wish to reiterate that the land owned by our client is immediately available for redevelopment. Whilst we accept in principle the site coming forward alongside the adjacent land to its west (the 'original' SR-0065), we do not consider that redevelopment of the land should be predicated on the remainder of the area coming forward. Based on the recommendations set out in Draft Submission Version of the Local Policy SP3, for densities of between 30 and 50 dwellings per hectare, it is our view that this site should be promoted for between 390 and 650 homes. Provided any such redevelopment is not prejudicial, then we see no reason why the land in our client's ownership could not come forward once the Plan is adopted, with remaining land coming forward in later phases.

We look forward to receiving your acknowledgement that these comments have been received and are being taken into consideration. Should you have any queries or wish to discuss please do not hesitate to contact Guy Bransby (0207 399 5409) or Emily Cochrane (0203 147 1632) of these offices.

Yours faithfully,

JLL