



Planning Our Future
Planning Policy
Epping Forest District Council
Civic Offices
323 High Street
Epping
Essex
CM16 4BZ

29 January 2018

BY EMAIL: ldfconsult@eppingforestdc.gov.uk

Dear Sir, Madam,

**REPRESENTATIONS FOR THE SUBMISSION VERSION OF THE EPPING FOREST DISTRICT
LOCAL PLAN 2011-2033 (REGULATION 19 PUBLICATION)
SITE: NAZE.E3 - BRIDGE WORKS AND GLASSWORKS AT NAZEING NEW ROAD**

Iceni Projects has been instructed by our client, Nazeing Marina Village Ltd, to provide representations in respect of the Submission Version of the Epping Forest Local Plan (December 2017).

By way of introduction, Nazeing Marina Village Ltd is single purpose construction and development company, focusing on commercial and residential development. Nazeing Marina Village Ltd, through its Directors, has significant experience in utilising their industry knowledge to deliver a wide range of development projects embracing the principles of economic, environmental and social sustainability.

Nazeing Marina Village Ltd has an interest in the site at Nazeing Glassworks, identified in the Submission Version Local Plan (December 2017) as 'NAZE.E3 Bridge Works and Glassworks at Nazeing New Road'. These representations address the proposed allocation of this site for employment use.

The Site

The site is brownfield land and sits outside of the designated Green Belt. The site currently comprises of the Nazeing Glass Works Factory and associated shop, together with a range of various small commercial occupiers, including; light industrial, retail, storage, office and gym uses. The existing lawful uses comprise of a mix of B1, B2, A1 and D2 Use Classes.

The existing buildings on the site consist of one main continuous mass, with some smaller associated structures. The existing buildings comprise of approximately 8,800 sqm of employment floorspace, which together with the extensive areas of hardstanding and low grade internal roads, account for over 60% of the site.

The existing buildings are of extremely low quality and energy efficiency, and are coming to the end of their natural life. The buildings are therefore no longer fit for purpose without significant investment to bring them up to the standards to meet the needs of modern day occupiers.

The site is accessed from Nazeing New Road along a poor quality narrow road which runs through the site, providing access to extensive areas of parking and the commercial units. Further parking and access is provided in courtyards between the buildings and there is also a small car park at the southern end of the access road. The site is therefore dominated by either built form or areas of hardstanding, which has created a car dominated environment that is not pedestrian or environmentally friendly.

The south west component of the site is occupied by an open area of low quality grass land, which includes extensive mature tree planting along the western boundary adjacent to the existing residential properties. This area of grass land has no real amenity value or function and currently contributes little to the site in terms of visual amenity or the ability to use for recreational activities. To the south of this grass area is a more densely vegetated area which is partly designated as Green Belt. This area is overgrown and poorly maintained.

In terms of public transport, Broxbourne Railway Station is located 900m to the west of the site (12 minutes walk or a 4 minute cycle ride) and includes services to London Liverpool Street (35 minutes), Bishop's Stortford (25 minutes) and Cambridge (just under an hour). Broxbourne Railway Station will also form Crossrail II's most northerly station and once operational will significantly improve the transport accessibility of the site.

Planning History

The planning history for the site identifies a large number of minor planning applications on the site for change of use and minor works applications.

Several more significant applications have been submitted on the parcel of vacant grass land between the existing commercial buildings and the residential terrace facing Nazeing New Road. These applications are summarised below:

- In August 1988, outline planning permission (EPF/1255/87) was granted for the erection of 8 light industrial units. This permission was subsequently renewed in September 1991 (Ref: EPF/0682/91).
- In August 1999, an outline application (Ref: EPF/1307/99) was submitted for 10 light industrial units (Use Class B1) and associated works. This was subsequently withdrawn in June 2001.
- In March 2006, an outline application (Ref: EPF/0395/06) was submitted for the erection of 2790sqm of light industrial units with parking and improved site access. This application was subsequently withdrawn in April 2006.

Planning Policy Context

Site Designations

The Council's current Local Plan document is the 'Combined Policies of Epping Forest District Local Plan 1998 and Alternations 2006', which was adopted in February 2008. Under the current Local Plan, the following designations are relevant to the site:

- Employment site;
- Within the Lee Valley Regional Park;
- Adjacent to Local Wildlife Sites;
- Outside of the Green Belt (but predominantly surrounded by Green Belt);

- Located within Flood Zone (benefiting from flood defence);
- No listed buildings identified on site or within the immediate vicinity of the site; and
- Not within or adjacent to a conservation area.

Within the Submission Version of the Local Plan (December 2017), the above designations still apply.

Employment Designation

Within the Submission Version Local Plan (December 2017) under Policy P 10 (Nazeing), the site is designated as employment site 'NAZE.E3 – Bridge Works and Glassworks, Nazeing New Road'. Emerging Policy E 1 (Employment Sites) sets out the Council's approach to employment sites and seeks to retain and enhance existing premises. Proposals for the redevelopment, renewal, intensification of existing uses being encouraged. In particular the Council will support and encourage flexible local employment space.

Housing Need

With regards to housing provision, the Submission Version Local Plan (December 2017) states that within the plan period (2011-2033) the Council will seek to provide approximately 11,400 new homes across the District. This equates to 518 homes per year. Emerging Local Plan Policy SP 2 (Development Strategy 2011-2033) distributes 9,818 homes across the various settlements within the District. The emerging Local Plan anticipates that the remaining housing need to achieve 11,400 new homes will be made up from homes that have already been built out since 2011, existing permissions and windfall sites.

Of the 9,818 required new homes identified in Policy SP 2, approximately 122 homes are allocated to Nazeing. In order to deliver these new residential sites, the Council is proposing to significantly alter the Green Belt boundary around Nazeing to the north, south and east of the settlement to remove the proposed residential site allocations from the Green Belt. The proposed residential sites require the release of and comprise approximately 4.2 ha of Green Belt land. The proposed sites are as follows:

- NAZE.R1 Land at Perry Hill – targeted to deliver approximately 33 homes;
- NAZE.R2 The Fencing Centre, Pecks Hill – targeted to deliver approximately 29 homes;
- NAZE.R3 Land to the rear of Pound Close – targeted to deliver approximately 39 homes; and
- NAZE.R4 Land at St Leonards Farm – targeted to deliver approximately 21 homes.

The Emerging Local Plan recognises that recent household projections demonstrate a further upward trend in housing need and the document acknowledges that the identification of additional housing sites will play a key role in positive planning to meet future housing need. We understand that the housing need figures are currently being reviewed on a District wide basis, and the 11,400 new homes currently required is likely to be increased. Therefore, the identification of appropriate brownfield sites will be fundamental to prevent the release of further Green Belt land and address future housing need.

Detailed Representations

In consideration of the Local Plan Submission Version (December 2017) consultation, Nazeing Marina Village Ltd is supportive of the overall need to review the current Local Plan and welcomes the long-term objectives of the document in setting the growth agenda for Epping Forest over the next 20 years. Furthermore, Nazeing Marina Village Ltd is supportive of the scope of the Local Plan and considers it important to address all aspects of growth within the District over the defined period including housing and employment uses.

With regard to specific allocation of the Nazeing Glassworks site under 'NAZE.E3', Nazeing Marina Village Ltd would like to make representations to incorporate flexibility in the designation. We propose

that amendments are made to the site designation to allow mixed-use development on the site, which will enable the delivery of employment, housing and other complimentary uses. We have set out our reasoning for this below.

Site Allocation NAZE.E3

We consider that the site provides a unique development opportunity to regenerate a long-term employment site that has seen little investment over the course of its lifetime. The existing site is surrounded by Green Belt, the Lea Valley Regional Park, and protected wildlife sites, but currently does very little to compliment and integrate positively with the surrounding area. The existing buildings on the site are of low quality and the site is dominated by large areas of hardstanding and low grade open space.

Located a short distance from Broxbourne Station, the site currently benefits from excellent transport links, which will be significantly improved in the future through Crossrail II. Together with being previously developed land (brownfield), the site presents a sustainable development opportunity that has the potential to deliver a high quality mixed-use development which positively contributes towards meeting future employment and housing demands.

Employment

It is recognised that the site has made a positive long-term contribution towards the employment needs of this part of the District through accommodating a variety of small and medium sized local businesses. By allowing a genuine mixed-use development to come forward on the site, we consider that this will secure the long-term future of the site as a vibrant employment hub in a sustainable location, which could deliver high quality employment floorspace, along-side much needed housing.

In line with Emerging Policy E 1 and the Council's approach to existing employment sites, a mixed-use allocation would still enable the intensification of employment generating floorspace on the site, and through the provision of high quality flexible commercial floorspace suitable for a range of business users, could significantly increase employment densities. As part of a mixed-use allocation for the site, we consider that there is also potential to incorporate retail and leisure uses that could complement any business uses and contribute towards the placemaking principles of redeveloping the site.

Housing

Whilst it is acknowledged that the re-provision of employment uses on the site will be a key priority for the Council, it is also acknowledged that there is a pressing need for housing, and a pressing need to supply suitable brownfield land to meet increasing future demand. We consider that the site has the opportunity to form a vital part of both the local and the regional housing strategy and is capable of delivering a significant number of high quality new homes, with active ground floor uses and animated public open spaces that connect to the wider area.

Planning policy at all levels seeks to boost the supply of housing and plan positively to address future demand through the effective use of previously developed land (brownfield), provided that it is not of high environmental value. We consider that the site has the potential to deliver up to 300 new homes, which could comprise a variety of housing types and sizes to meet local need, including much needed affordable housing.

Whilst not currently identified as a housing site in the Submission Version Local Plan (December 2017), the site sits outside of the Green Belt and is a low-quality brownfield site that does not compliment the surrounding area. We therefore consider that the site represents a unique opportunity as a sustainable alternative to future development in the Green Belt (as set out in the 4 sites allocated

in the Plan). The sustainable re-use of brownfield land, before releasing designated Green Belt land, is enshrined and encouraged in planning policy at all levels and we consider that insufficient consideration has been given to the potential of the site for mixed-use development.

The site currently benefits from being in close proximity to Broxbourne Station and with introduction of Crossrail II, this will further enhance the transport connections to the local area, Greater London, and beyond. Through the delivery of housing within a mixed-use development, this will enable the delivery of the enhanced employment floorspace and contribute towards creating a new sustainable community.

Environmental

Any future design approach for the site should optimise the development potential to ensure viable delivery, but ensure that a high-quality environment for future businesses and residents is created. To achieve this a 'design and landscape-led' approach needs to be taken to ensure that an exemplar development will be delivered.

Building layouts and heights should be informed by the existing context and need to respond to the properties on Nazeing New Road and positively address the adjacent lagoon, Lea Valley Regional Park and the adjacent Green Belt. Proposals should seek to maximise the level of amenity space, play space, green spaces, public realm and connections through the site to contribute towards creating a 'liveable neighbourhood'.

A key component for any future mixed-use development on the site should be how the site connects with the wider area and responds and integrates with surrounding Green Belt, Lea Valley Regional Park, adjacent lagoon, and surrounding public footpath network. A pedestrian friendly environment should be created that encourages informal play and community interaction. By taking this approach, it can enable the delivery of a viable mixed-use development, which can positively contribute to the existing community and deliver a wide range of planning benefits.

Full consideration should be given to the environmental constraints of the site which will need to inform the design of any future development on the site, in order to deliver an exemplar sustainable development. The site is part located within Flood Zone 2, part Flood Zones 3a and a small proportion within Flood Zone 3b. The site benefits from the protection of formal flood defences and is located in an area of "low" or "very low" surface water flood risk.

Whilst it is acknowledged that site is at risk of flooding, the site currently comprises a significant area of built form and hardstanding and therefore we consider that there is an opportunity to improve and mitigate the risk of flood at the site by undertaking an innovative approach to design. Any flood risk strategy should therefore broadly incorporate the following:

- Assess flood risk from all sources and include an allowance for climate change in this assessment;
- Design finished floor levels to be above the 1 in 100 year flood level, including climate change so that development is future proofed;
- Ensure there is no net loss of floodplain storage by either maintaining the same building footprint as the existing built form or providing floodplain compensation where it is proposed to increase building footprints;
- Design aspects any future development to be floodable, e.g. undercroft car park;
- Manage surface water arising from the development through the use of sustainable drainage techniques to meet the requirements of Essex CC in their role as Lead Local Flood Authority;
- Design safe access and egress from any development and produce an emergency flood plan in consultation with the Council to ensure in the event of a flood that residents can safely escape;

- Ensure that the existing watercourses and flood defences are protected by maintaining an 8m buffer zone from them.

The existing buildings on the site, together with the extensive areas of hardstanding and low grade internal roads, account for over 60% of the site. Through an innovative and sensitive design, there is therefore an opportunity to deliver significant environmental and sustainability improvements through the redevelopment of the site with a high quality mixed-use development.

Summary & Conclusion

To conclude, Nazeing Marina Village Ltd are supportive of the principles of the Submission Version Local Plan (December 2017) and welcome the long-term objectives of the document in setting the growth agenda for Epping Forest.

Whilst Nazeing Marina Village Ltd are supportive of the growth agenda within the District over the defined period, we consider that in the interest of positive planning and the pressing requirement to address projected future increases in housing need, site 'NAZE.E3 – Bridge Works and Glassworks, Nazeing New Road' should be allocated for mixed-use development, to include employment, housing and other supporting complimentary uses.

The brownfield site represents a sustainable alternative to the proposed Green Belt residential site allocations as identified within the Plan. The site has the potential to form a vital part of both the local and the regional housing strategy and is capable of delivering a significant number of high quality new homes, with active ground floor uses and sensitively designed green open spaces that connect to the wider area.

We trust that these representations are clear and will be taken in to consideration when finalising the Local Plan document and we look forward to hearing from you in due course.

Yours sincerely,

A large black rectangular redaction box covering the signature of Kieron Hodgson.

Kieron Hodgson
Director