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25th January 2018

ref: EFDC -1801.675

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Dear Sir / Madam

EPPING FOREST DISTRICT COUNCIL - LOCAL PLAN SUBMISSION OBJECTION IN RESPECT OF PICKFIELD NURSERY (SR 0161)

The Objection - Non Compliant Preparation of The Submitted Local Plan

I object to the proposed local plan as presented at the Full EFDC Council Meeting on 14th December 2017. This objection is based on the fact EFDC have not prepared a justifiable plan supported by adequate evidence. As such the plan fails to comply with relevant legal requirements and thus the plan is unsound.

My statement is made in connection with the council's failure to properly consider the site known as Pickfield Nursery, Pickhill, Waltham Abbey. The site was not assessed as a possible preferred site and thus not incorporated as a development site in the initial draft publication of the local plan (November 2016). This was a result of the fact the council had mistakenly combined the nursery with a larger group of sites. This larger group had various failings and was understandably rejected as a future development area. However had Pickfield Nursery been assessed as a separate entity it can be shown the site can provide an outstanding potential housing development.

After the publication of the draft Local Plan, the council were asked to correct their mistake. Following the consultation process and the subsequent re-evaluation of the Plan; there was still no published record to show the nursery site had been properly assessed as a separate entity. Thus the amended Local Plan debated by Council on 14th December 2017 did not include proposals for Pickfield Nursery as an independent viable development site. It must be concluded Pickfield Nursery has still not been properly assessed, and consequently has still not been adopted as a "preferred site".

Pickfield Nursery Should Be Removed From The Green Belt - Introduction

During the council meeting on 14th December 2017 it became obvious the Councillors were frustrated by the fact they were being forced to agree to the new Local Plan without proper scrutiny. The lateness of the presentation to the council's cabinet, together with the possible penalty of finding sites for thousands of additional homes, resulted in the meeting being forced to accept decisions they obviously believed were wrong. A much discussed example is the intension to build on public open spaces in Debden and Loughton. It was obvious the meeting wished seek amendments to the proposal, but the circumstances

forced the council to adopt the plan being presented.

It is an outrage that the unused Brownfield site of the former Pickfield Nursery is, under the current proposal, to be left as a derelict wasteland while public open spaces are to be lost at the heart of communities such as Debden and Loughton. Pickfield Nursery is a unique site, where monies must be spent to clear contamination; but if spent the land will be transformed into an outstanding site able to accommodate many new homes for local people. In its current state Pickfield Nursery will have to be permanently fenced and abandoned, unable to make any useful contribution to the Green Belt, the local community or the wider public. However with the development of the land for housing a suitable budget would be raised. Until the decision is made to permit the development of this site, it will remain as an appalling scar on the green belt. With regard to its sustainability the site has ratings which far out perform many of the sites currently included in the proposed Local Plan.

A description of the Nursery, its history, location, topography and other qualities is given in the following paragraphs.

Description of Pickfield Nursery

The 4.5 hectare site is located North East of Waltham Abbey town centre between an established residential area and a small river known as Cobbin's Brook (see appendix A). The roughly rectangular plot lies behind a row of suburban dwellings NW of the residential road "Pick Hill". The land drops gently away from the existing dwellings to the meandering course of Cobbin's Brook.

Photographs are incorporated into this document as Appendix B. The photos have been grouped to show :

- The road junction between Upshire Road and Pick Hill with the Bus Service which passes the Nursery site.
- Paternoster House - A Nursing Home built on the former adjoining Glasshouse site.
- Two access points serving the Pickfield Nursery site.
- The remains of the glasshouses and other Nursery buildings.
- Broken glass, collapsed walls, concrete, corroded metalwork, heating pipes etc. that cover the entire site.
- The Braithwaite water tower, oil tanks, boilers, petrol pump, and other plant remaining on the site.
- Cobbin's Brook.
- The footpath passing to the N.E. of the Nursery site.

Over the decades of the 1960's, 1970's and 1980's Pickfield Nursery declined from a viable commercial unit to its now derelict state. A dramatic blow was struck by the unforgettable storm of October 1987. Although many of the greenhouses had already fallen and trading had virtually finished, most of the remaining structures were flattened by the storm. After that Pickfield Nursery rapidly declined to the point where all commercial activity ceased.

In the previous decades and particularly during WW2, the site operated as a viable food production unit. However the cost of labour, transport systems, mechanisation and agricultural policies have changed relevant criteria for the nursery industry. Modern practice requires financially robust, well established organisations with large glasshouses on flat sites unencumbered by the concerns of residential neighbours.

In recent years the landowners and their forbears have been powerless to stop the inevitable dereliction of both the land and the business. The entire site has become unusable, in part concealing the devastation and hazards beneath. Despite the erection of security fencing and other measures local children and youths regularly break-in and vandalise anything left unattended, often putting the children themselves at risk.

Contamination

Whilst some of the ancillary buildings remain on the former nursery site the glasshouses have gone. That is with the exception of the remnants of one timber frame partially glazed on its SW face. It is clear that some of the more easily reclaimable materials of construction have been removed from the site, but there are still extensive areas of brickwork, concrete and broken glass amongst the self seeded vegetation. Three or four boilers can be seen above ground complete with their air circulation units. However it is obvious much more of the extensive heating system is hidden from view either beneath vegetation or below ground. As with most other commercial nurseries in the Lea Valley, these boilers were fired by heavy oil. In preceding decades rules for the storage of oil were less stringent and less rigorously enforced; hence a survey is needed to assess the full extent of oil pollution within the ground. Habitually, nurseries within the Lea Valley have buried waste vegetable matter. As a result one must expect a high content of organic matter to be found in parts of the site, and this is likely to lead to the build up of methane gas.

In addition to the boiler and heating system, the remains of many other pieces of equipment, tanks and machinery are still present on the site. Two such items of plant must be mentioned; the steel frame, approximately 8 metres high, which supported the former Braithwaite water storage tank; and the diesel fuel pump together with its underground storage tank.

Finally it is essential I return to the question of glass. In order to make use of the land the entire top soil must be removed wherever the glasshouses have fallen. It is estimated this equates to an area of between 2 and 2.5 hectares. (see Appendices A and B)

A visit to the site must leave the observer with no doubts that the land is seriously contaminated. I understand discussions with Quantity Surveyors indicate the cost of removing such contamination will be substantial, that is several hundred thousand pounds. This cost would itself make any form of commercial horticulture or agriculture unrealistic, irrespective of any other development constraints. It is unlikely that such contamination could be eliminated without the additional development value which would be generated by the site's re-designation for major development.

The Development of Neighbouring Land and Sites

It can be seen from the accompanying maps and photographs, access to Pickfield Nursery is from the residential street of Pick Hill. This juxtaposition with Pick Hill and the suburban settlement beyond renders the site totally unsuitable for its resurrection in a horticultural capacity :-

Both during its active years as a nursery and more recently whilst the land has remained unused, considerable friction has existed between local residents and the nursery. The

local authorities own records will bear witness to this fact. For the business to survive any new nursery buildings would need intensive use, possibly including the use of artificial lighting at night. Local people would undoubtedly object.

H.G.V. vehicles are now fundamental to the financial viability of nursery sites. Local people in the quiet residential street of Pick Hill would find these intolerable.

Vandalism is already a major issue. New glasshouses, in close proximity to a residential area, are likely to encourage a dramatic increase in this problem.

These issues of location together with the level of contamination make this particular site a very unattractive proposition to any organisation wishing to invest in new nursery buildings.

South West of Pickfield Nursery another former nursery site also suffered the same history, falling into decline and ultimate dereliction. It was also located within the Green Belt, on sloping ground between the residential properties and the local water course of Cobbin's Brook. However its problems were solved when Epping Forest District council agreed to grant planning permission for the "Paternoster House Nursing Home". This development is now fully operational and serves as the immediate neighbour to Pickfield Nursery.

North East of Pickfield Nursery 79 new homes have recently been built on another Green Belt nursery site (SR-0137) formerly known as "Knollies". When assessed for its suitability as housing development land it fell well below the sustainability ratings that must be attributed to Pickfield Nursery. However planning permission was granted by Epping Forest District Council and the construction on site is now complete.

West of Pickfield Nursery Lea Valley Nurseries (SR- 0099) together with other adjoining sites have been included in the submitted Local Plan and will provide another 740 new homes together with a new secondary school and a site for travellers.

After these new homes have been completed Pickfield Nursery will become a pocket of derelict wasteland surrounded by existing and new residential developments. It is ironic that Pickfield Nursery had and has the highest sustainability ratings with the strongest case for development.

Topography of the area

The topography of the countryside should play a fundamental role in determining the natural boundaries of the Green Belt. However administrative boundaries generally derive from historic ownerships or parish boundaries and rarely reflect the realities of natural features, forms and topography. Such is the case here.

As with most water courses Cobbin's Brook is not only a significant and valuable natural feature it forms a positive defensible boundary. Further more it is the focus of the local land forms. The Brook flows in a S.W. direction towards Waltham Abbey Town Centre. Each side of the river the land rises approximately 30 metres to the high ground.

To the S.E. of the former nursery Pick Hill follows the 32 metre contour line. Behind the row

of houses and bungalows the land drops away towards Cobbin's Brook hiding the site from public gaze and of glimpses of the huge structure that supported the former Braithwaite Tower. It is this slope which makes passers by virtually unaware of the former nursery, and will dramatically reduce the impact of any future site development.

When seen from the high ground to the NW green fields gently slope down to Cobbin's Brook and the trees and shrubs which occupy the river's flood plain. These trees serve to screen the rising land beyond which is the wasteland of the former Pickfield Nursery. With the topography and the existing landscape described above, this is one of the most discrete development sites imaginable. Only if local people decide to use the footpath to Breaches Poultry Farm, would they get a glimpse of the scheme. Even then, with extra planting in the Cobbin's Brook flood plain and alongside the footpath, the view of the development by passers-by would be very limited.

The Brook, reinforced by the flood plain and its trees and shrubs, is the natural boundary in the landscape. A boundary which forms a far more suitable divide between the suburban settlement and the open countryside than the existing Green Belt boundary.

As regards the Brook's flood plain recent statements by the Environment Agency show only a small part of the site need be set aside for flood control measures. The scheme prepared by Crest Nicholson takes account of this with the Cobbin's Brook flood plain adopted for landscaping to enhance the new housing and the general environment for the local community.

Review of Alternative Uses

I am aware alternative uses for the land have been considered. Planning policies declare various activities are accepted as appropriate within the Green Belt. However it must be recognised none of these activities are possible for the Brownfield Site that is Pickfield Nursery :-

The cost of removing contamination make it uneconomic for alternative agricultural or forestry use. Furthermore stripping the site would leave a surface devoid of topsoil that is essential to grazing or arable use, adding a further cost to reinstate topsoil. This same consideration would rule out use as an equestrian centre.

The topography is not ideal for sports activities. However it is again the question of the cost of decontamination and reinstatement which rules out such recreational functions.

There are no suitable buildings on the site capable of adaption to comply with existing planning policies (new uses in retained buildings within the Green Belt).

Use as a garden centre is again unlikely to be viable as it would require site clearance and new buildings. But in this instance it is conflict within the existing residential community that would render the option impossible. Pick Hill is a narrow suburban road unsuitable for heavy goods vehicles and a dramatic increase in retail traffic.

The Logic for the Removal of Pickfield Nursery from the Green Belt

It is my sincere belief Pickfield Nursery should be removed from its inclusion within the Green Belt and incorporated into the new proposed Local Plan as a "preferred site" for development as housing. My reasons for this are summarized below :-

1 London's Green Belt was established approximately 60 years ago. At the time

Pickfield Nursery was a viable horticultural unit with extensive glass houses, packing sheds, boiler houses and other ancillary buildings. As such it met criteria for inclusion within the new Green Belt. Times have changed: the location and topography of the site has now made the unit totally unsuitable for horticultural use. Following the great storm of 1987 all production ceased and the land became derelict.

2 Continued designation of Pickfield Nursery as Green Belt is inappropriate as it fails to take into account the extreme contamination of the site, its location topography and general condition.

3 As a consequence of this extreme contamination it can be of little or no value to the local environment. It is unable to make a proper contribution to the Green Belt for horticultural or agricultural purposes. With the substantial cost of decontamination it would be impossible to introduce recreational or sports activities; or any other practical use acceptable to its Green Belt designation.

4 The topography and other natural features of the land are such that the current edge of the Green Belt has little rationale. The water course "Cobbin's Brooke" together with its flood plain provide a far more suitable divide between the local residential settlement, and the open countryside of the Green Belt.

5 The land is effectively a Brownfield site appropriate for housing by its location. With a housing development, investment funds would be available and enable the extensive work required to decontaminate the land. This development would provide many new homes including much needed "affordable housing".

Development Proposal

The housing development company Crest Nicholson have been working in partnership with the land owner and have become totally committed to developing the site for new housing. Their belief in the site's suitability and potential has progressed to the preparation of a detailed scheme for 85 new dwellings, fully compliant with all planning requirements, Environment Agency recommendations etc. etc.

It is understood a major concern for the local plan is the timescale in which the allocated sites and schemes can be delivered. Many of the sites designated in the Waltham Abbey area will take several years to assemble, organize, design, plan and build; particularly with the considerable number of objections that will inevitably be raised (eg on the Lea Valley Nurseries site SR-0099). In contrast the proposals for Pickfield Nursery are very advanced. The house builder "Crest Nicholson" has been appointed; the site layout and new dwellings have been designed and the necessary site construction investigations have already been carried out. Furthermore pre-application planning meetings have been held and favourably assessed by council officers, with their subsequent recommendations incorporated into the scheme. In conclusion work on site to deliver the dwellings can start as soon as the planning process allows. The logic of removing this site from the Green Belt, and incorporating its development as a "preferred site" into the Local Plan is truly overwhelming.

Conclusions

This site offers an opportunity to solve several problems at a stroke:

It is currently a highly contaminated wasteland without value as farmland or as a horticultural production unit .

In its current condition the land has no value to either the Green Belt or to its neighbouring community in Waltham Abbey. In practical terms it cannot serve as agricultural or horticultural land, nor for recreational or sports activities. Its contamination also precludes it from all other uses that are deemed acceptable to the Green Belt.

Its removal from the Green Belt will significantly improve the logic of the Green Belt boundary.

Pickfield Nursery is effectively a Brownfield Site. The illogical fact the land remains within the Green Belt has precluded the recognition of this simple fact. As soon as this contradiction is acknowledged all problems associated with the land will be solved.

The site's development will provide much needed housing including affordable dwellings. The incorporation of the 4.5 hectare site into the Local Plan will convert this derelict land into a useful component within the local environment, and reduce the pressures for the development of public open spaces in locations such as Loughton and Debden.

Unlike many other sites chosen as "preferred sites" within the Local Plan, this proposal can deliver new homes as soon as the planning system grants permission.

I respectfully request the Inspector recommend Pickfield Nursery be removed from the Green Belt, and allocated as a "preferred housing site" within the proposed local plan.