

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

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Letter or Email Response:

Background 1.1 This objection is submitted on behalf of several clients with interests in LOWER NAZEING and relates to designation in The Settlement Hierarchy Technical Paper September 2015 of Nazeing as a "Small Village". Objection is also raised to the consequential modest housing allocation in Draft Policy SP2: Spatial Development Strategy 2011 to 2033 of just 220 dwellings over the lifetime of the Plan. Specific clients on whose behalf this objection is lodged are:-
....Redacted.... 1.2 The July 2012 Community Choices Issues and Options for the Local Plan identified Lower Nazeing as potentially suitable for a wide range of additional housing numbers depending upon the approach chosen for housing distribution across the District. It indicated through the two key spatial options identified as "Possible Opportunity Areas" - namely NAZ A and NAZ B - that in the region of 450 to 690 homes might be provided, the larger figure coming from NAZ A to the south of the village whilst NAZ B was identified as potentially suitable for 3.2ha of employment land in addition to about 450 homes. 1.3 The decision to reduce the potential housing allocation in the village to just 220 dwellings in Draft Policy SP2 is a consequence of its classification within the Settlement Hierarchy as a small village. Objection is raised to this because of:- a) Failure of the analysis undertaken to determine The Settlement Hierarchy to pay due regard to the existence of employment opportunities within the District's settlements; b) Inaccuracies in the Appraisal Sheet contained within the Settlement Hierarchy Technical Paper in respect of Lower Nazeing; and c) Lack of any weighting given to facilities. 2.0 Failure of the analysis to pay due regard to the existence of employment opportunities within the District's settlements 2.1 The Settlement Hierarchy Technical Paper September 2015 recognises that there is no set methodology for establishing a hierarchy and that a wealth of information exists which can be used to determine how settlements function in relation to each other and hence their place within a District's hierarchy. This is accepted and it is acknowledged that any hierarchy will thus be based on an element of subjective judgement. The approach chosen has been to analyse each settlement against five key categories of Education Health Transport Retail and Community Facilities 2.2 Objection is raised to the fact that this analysis omits any reference to the existence of employment opportunities within each settlement. Given that the Paper acknowledges that roughly half of the District's resident working population commute to London this is a surprising omission. Provision of housing alongside employment opportunities in order to help reduce the need to travel should be a key plank in the provision of sustainable development in any District and especially so in one with such high levels of out commuting. 2.3 Lower Nazeing contains probably the highest levels of employment of any of the District's villages. Together with Roydon and Waltham Abbey it is the main centre within the Lee Valley of the horticultural industry. Horticulture and agriculture together provide just under 5% of the District's employment, a significant proportion by modern standards. There are three very large horticultural sites - Valley Grown Nurseries in Paynes Lane, Tomworld at Shottentons Farm off Pecks Hill/Sedge Green and UK Salads in Netherhall Road - in Nazeing employing significant numbers of people. For example,

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Tomworld has 80 staff and this figure is due to double on completion of the fourth phase of its expansion. There are many other nurseries in and around the village. 2.4 However, in addition to horticulture there are other important employment centres, the largest being Hillgrove Business Park located on the north side of Nazeing Road which is the base for some 36 companies. Hoe Lane in Nazeing is another significant centre for employment with several industrial units on farms as well as larger sites at Birchwood Industrial Estate and Millbrook Business Park. Unfortunately there appears to be nothing in the Council's evidence base which quantifies employment within the parish but based on the number of active companies it will almost certainly be significantly higher than other rural parishes within the District. 2.5 The fact that no consideration has been given to the size of the local employment base when assessing the position of Lower Nazeing within the Settlement Hierarchy is therefore considered to be a serious deficiency. 3.0 Inaccuracies in the Appraisal Sheet contained within the Settlement Hierarchy Technical Paper in respect of Lower Nazeing 3.1 Turning to the assessment for Lower Nazeing set out on pages 53 and 54 of the Paper, there are a number of inaccuracies, viz:- In respect of education the web site for Nazeing Primary School says that it takes children from 4 years suggesting that the failure to ascribe a score to Nursery/Childcare is incorrect. In respect of retail there was a Post Office in Nazeingbury Parade at the time of the assessment so this should have been scored positively. In respect of community facilities there are a number of halls including St Giles Church Hall, Congregational Church Hall, Bumbles Green Leisure Centre and the hall at Nazeing Primary School all of which function as community halls. Hence this should have been scored positively. Bumbles Green is located within the parish, a relatively short distance from Lower Nazeing, and has a Leisure Centre so again this should be scored positively. Existence within the parish of Lee Valley Regional Park with its extensive range of outdoor recreation facilities has also been ignored. 3.2 If points are added to the four items identified above which have been scored incorrectly this would give Lower Nazeing a score of 14, bringing it into the category of a Large Village. This is before any consideration is given to the presence of such extensive employment opportunities. 3.3 The Qualitative Analysis of Lower Nazeing notes, inter alia, that "There are a number of services and facilities present that would also serve the wider rural area including smaller settlements such as Bumble's Green and Nazeing village. It further records that Lower Nazeing has bus services connecting it to the higher order settlements of Waltham Abbey, Broxbourne and Harlow. Looked at in the round, therefore, it is considered that the evidence base justifies the designation of Lower Nazeing as a Large Village. 4.0 Lack of Weighting to Facilities. 4.1 I consider this to be a further deficiency of the approach taken. It is particularly relevant under the heading of Retail where no additional weighting is given if more than one retail facility exists. Thus, the existence of a parade of shops in the heart of the village which provides a good range of convenience goods shopping including a mini supermarket, butcher, baker/sandwich shop, hot food take away, dry cleaners, news agent, hairdresser/beauty parlour and a pharmacy is scored just one point in the same way that a village with only one shop has been scored one point. This approach misrepresents the true sustainability credentials of a settlement. 5.0 Parish Council Website 5.1 It is interesting to note that Nazeing Parish Council's web site includes the following statements:- "Nazeing is said to be one of the largest villages in the UK. It is a hive of activity where business is concerned and boasts many good pubs, beautiful churches and excellent leisure facilities such as golf, sailing, walking, cycling etc. Nazeing is within walking distance from the London Olympic White Water Rafting Centre at Lee Valley Park in Waltham Abbey. There is a railway station 2 miles away at Broxbourne and, of course, Lee Valley Regional Park which stretches an incredible 26 miles along the leafy banks of the river Lee from Ware, through Nazeing, to the Thames at East India Dock Basin". This description, written by local people, is hardly supportive of the District Council's categorisation of the settlement. 6.0 Revision to Settlement Hierarchy 6.1 Having regard to all of the above it is considered that Nazeing should be re-classified as a Large Village together with Buckhurst Hill, Chigwell, North Weald Bassett and Theydon Bois. In terms of population Lower Nazeing had a figure of 3874 at the 2011 census. If the populations of Broadley Common & Epping Upland are added this gives a parish population of 5844. This is larger than both Theydon Bois (4062) and North Weald (4477) both of which are classed as "large villages". 6.2 It is noted that of the approximate total of 220 new dwellings envisaged in accordance with Draft Policy SP2 Spatial Development Strategy 2011 to 2033 all proposed allocations should come forward within first 5 years of the Plan with nothing proposed post 2021. Identifying Lower Nazeing as a Large Village, which it undoubtedly is, and allocating a higher number of houses would enable provision to be made for the later Plan period. 6.3 It is further noted that Part C of Draft Policy P10 states that Infrastructure requirements must be delivered at a rate and scale to meet the needs that arise from the proposed development, in accordance with the Infrastructure Delivery Plan. It would appear that the latter has yet to be written. However, in the absence of any indication at this stage of the plan making process of what the settlement's infrastructure needs are there can be no certainty that the proposed housing, traveller site and employment allocations will be able to fulfil infrastructure

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needs. One of the key issues identified from responses to the Community Choices consultation was the issue of existing traffic congestion including the large number of HGV movements through Nazeing, yet this is not addressed by the various land allocations for the village. Hence, that part of the vision for Nazeing which seeks opportunities to improve the highway network in order to ease congestion has not been addressed.